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October 16, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: WC Docket No. 09-197; Sage Telecom Communications, LLC
Amended Petition for Designation as an ETC

Dear Ms. Dortch:

Attached please find Sage Telecom Communications, LLC d/b/a TruConnect's ("TruConnect" or "Company") Amended Petition for Designation as an Eligible Telecommunications Carrier ("ETC"). In order to update the record due to passage of time and to reflect compliance with Federal Communications Commission ("Commission" or "FCC") rule changes, this Amended Petition both replaces the original petitions filed in 2013¹ and combines them into one document for efficiency and ease of review (with no change in requested service area, except to clarify the exclusion of tribal lands). The Amended Petition includes the following updates:

1. Current Company Overview and Operations: the Amended Petition updates the Company's affiliates, existing ETC designations, current operations (which now focus on prepaid wireless) and current underlying carriers;
2. Supported Services: TruConnect offers all supported services, including Broadband Internet Access Service ("BIAS") effective December 2, 2016;
3. Advertising: updated commitments, and updated sample ad (Exhibit 4);
4. Commitment to Comply with Applicable Requirements: expands the commitment to comply with all requirements applicable to receipt of low-income support (including those not already discussed, such as audit and reporting requirements, document retention requirements, etc.);
5. Ability to Remain Functional in Emergencies: updated to reference additional underlying carriers;

¹ See *Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia*, WC Docket No. 09-197, August 8, 2013; see also *Petition for Limited Designation as an Eligible Telecommunications Carrier in Maine for the Purpose of Lifeline Service*, WC Docket No. 09-197, December 18, 2013.

6. Consumer Protection and Service Quality Commitment: expanded to include customer service information, and updated CTIA Code compliance (Exhibit 6);
7. Financial and Technical Capability: updated in light of changes in Company operations, as well as an additional five years of experience, and to include key management bios (Exhibit 7);
8. Proposed Lifeline offering: the current proposed Lifeline offering (summarized in Exhibit 8) complies with all applicable minimum service standards set forth in 47 C.F.R. § 54.408 (i.e. voice, mobile BIAS, and equipment). The Amended Petition also includes a commitment that TruConnect's plans will continue to meet the minimum service standards as such standards increase going forward;
9. Enrollment Processes: (a) a commitment to comply more generally with the initial and annual certification and verification procedures set forth in 47 C.F.R. §§ 54.409-54.410, to the extent they have changed (i.e. streamlined eligibility, rolling recertification, etc.) and may change in the future; (b) a commitment to comply with the requirements of the National Lifeline Accountability Database ("NLAD"); (c) a commitment to comply with the National Verifier, once deployed in each respective state; and (d) a commitment to comply with the de-enrollment procedures in 47 C.F.R. § 54.405(e);
10. Universal Forms: a commitment to use the FCC's Universal Application Forms (which replace the Sample Enrollment Forms previously included as Exhibits);
11. Additional Waste, Fraud and Abuse Prevention: (a) revision of subscriber usage policy in accordance with FCC rule changes (i.e. 47 C.F.R. § 54.405(e)(3) and § 54.407(c)(2)), and (b) expanded discussion of distribution methods (to include online, and the option for limited use of agents in person in accordance with FCC rules and best practices) as well as the Company's rigorous verification process—both with automated real-time and manual back-end reviews—to guard against duplicate subscribers; and
12. Public Interest: expanded to discuss Lifeline adoption rates and the unique benefits of TruConnect's Lifeline service, also noting that TruConnect is prepared to offer its customers telehealth applications enabling customers to more readily access world-class healthcare consistent with the FCC's recent inquiries on telehealth.

The Amended Petition also notes that the FCC has not processed any pending ETC petitions in over six (6) years, ultimately putting customers in Alabama, Connecticut, Delaware, the District of Columbia, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, and Virginia (the "Non-Jurisdictional States") at a disadvantage compared to other states across the U.S. that have allowed competition. TruConnect proposes to offer Lifeline customers a plan that meets *both* minimum service standards (i.e. 1,000 voice minutes and 2 GB data as of Dec. 1, 2018) for no net cost after application of Lifeline support. Further, TruConnect also offers Lifeline-discounted bundle plans with unlimited talk, text and data (ranging from 2.5 GB for \$15 net cost to 6 GB for \$35 net cost) which are highly competitive and provide affordable voice and broadband access for consumers with higher usage needs. Introducing TruConnect into the market as an additional wireless ETC provider in the Non-Jurisdictional States will afford low income residents a wider choice of providers and available services while enhancing a competitive marketplace, and will help to close the widening gap for wireless and broadband services.

Ms. Dortch
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As detailed in the attached Amended Petition, TruConnect meets FCC requirements for designation as an ETC and such designation would serve the public interest. TruConnect respectfully requests that the Commission expeditiously issue an order granting the Company's request for ETC designation.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Sage Telecom Communications, LLC

Attachments

cc: Nathan Johnson

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	
Sage Telecom Communications, LLC)	
)	
Petition for Limited Designation as an Eligible)	
Telecommunications Carrier in Alabama,)	
Connecticut, Delaware, the District of)	
Columbia Florida, New Hampshire, New)	
York, North Carolina, Tennessee, and Virginia)	
)	
and)	
)	
Petition for Limited Designation as an Eligible)	
Telecommunications Carrier in Maine for the)	
Purpose of Lifeline Service)	

AMENDED PETITION

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SUMMARY

Sage Telecom Communications, LLC d/b/a TruConnect (“TruConnect”) is seeking limited designation as an Eligible Telecommunications Carrier (“ETC”) in the States of Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia (collectively the “Non-Jurisdictional States”) pursuant to Section 214(e)(6) of the Communications Act, solely for purposes of offering services supported by the Universal Service Fund’s (“USF”) Lifeline program. TruConnect filed its original petitions for ETC designation with the Federal Communications Commission (“Commission”) on December 18, 2013 (Maine) and August 8, 2013 (all other states). In order to update the record in accordance with FCC rule changes, this Amended Petition both replaces the original petitions and combines them into one document for efficiency and ease of review.

TruConnect is a Mobile Virtual Network Operator (“MVNO”) that purchase wireless service on a wholesale basis from underlying facilities-based providers, primarily T-Mobile. Each Non-Jurisdictional State has stated that it does not exercise jurisdiction over wireless providers for purposes of ETC designation. Accordingly, pursuant to Section 214(e)(6), the Commission has the authority to designate TruConnect as an ETC in the Non-Jurisdictional States.

TruConnect meets all of the necessary requirements under Section 214(e)(1) for the limited ETC designation requested herein except for providing service, at least in part, using its own facilities. However, the Commission granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation in its *Lifeline and Link Up Reform*

Order released February 6, 2012.¹ Through its agreement with its underlying carriers, TruConnect has the ability to offer all of the services supported by the USF and set forth in Section 54.101(a) of the Commission's rules. TruConnect therefore respectfully requests that the Commission promptly approve the instant request for limited ETC designation to enable TruConnect to rapidly provide Lifeline services to qualifying customers in the Non-Jurisdictional States.

For over six (6) years now, the FCC has created a roadblock to competition in the Non-Jurisdictional States by not processing pending ETC applications. Only three (3) mobile providers such as TruConnect have been approved by the FCC to provide Lifeline service in certain Non-Jurisdictional States: TracFone Wireless (under "SafeLink Wireless"), Virgin Mobile (under "Assurance Wireless"), and i-wireless (under "Access Wireless"). The FCC has not processed any petitions for Maine since the state utility commission deferred jurisdiction in 2013, and thus there is only one (1) mobile Lifeline provider in Maine (Q Link Wireless, which was approved by Maine beforehand). By inaction, the FCC is favoring 2 or 3 particular providers, and putting customers in these states at a disadvantage compared to other states across the U.S. that have allowed competition.

Designation of TruConnect as an ETC in the Non-Jurisdictional States will provide consumers with a valuable alternative for obtaining telephone service. Low income consumers will have a stable contact method where traditional landline service is unavailable or not a viable option. In addition to the benefits of mobile service, the prepaid nature of TruConnect's services permit consumers to anticipate and control their communication costs. Introducing TruConnect

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

as an additional prepaid wireless ETC competitor should spur existing service providers to improve their offerings to low income consumers. TruConnect is an experienced Lifeline provider and is ideally suited to provide these customers with reliable and cost-effective wireless services. TruConnect's prepaid service offerings are highly competitive, with a no-cost plan (after application of Lifeline support) that meets both voice and broadband minimum service standards, as well as discounted retail plans with unlimited talk and various ranges of high quantity, high-speed data.

Accordingly, designating TruConnect as an ETC for Lifeline service is consistent with precedent, will serve the public interest, and should be granted without delay.

**Before the
Federal Communications Commission
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In the Matter of)	
)	
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AMENDED PETITION

I. INTRODUCTION

Sage Telecom Communications, LLC d/b/a TruConnect (“TruConnect,” “Sage d/b/a TruConnect” or “the Company”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (“Act”), and Section 54.201 of the rules of the Federal Communications Commission (“FCC” or “Commission”), hereby submits this Amended Petition requesting limited designation as an eligible telecommunications carrier (“ETC”) in the States of Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia (collectively the “Non-Jurisdictional States”) (“Amended Petition”). For the Commission’s convenience, this Amended

Petition replaces, in entirety, the Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia filed on August 8, 2013 (“Original Sage ETC Petition”), as well as the Petition for Limited Designation as an Eligible Telecommunications Carrier in Maine for the Purpose of Lifeline Service filed December 18, 2013 (“Maine ETC Petition”). This Amended Petition is intended to update the Original Sage ETC Petition and Maine ETC Petition to comply with FCC rule changes affecting the Lifeline program since the time of filing, and to combine the two (2) petitions into this one Amended Petition for sake of efficiency; there are no changes to the requested service areas that would require a new comment period.²

TruConnect seeks ETC designation in the Non-Jurisdictional States only for purposes of participation in the Universal Service Fund’s (“USF”) Lifeline program and does *not* seek to participate in the Link-Up or High-Cost support programs. Since the Alabama Public Service Commission, the Connecticut Public Utilities Regulatory Authority, the Delaware Public Service Commission, the District of Columbia Public Service Commission, the Florida Public Service Commission, the Maine Public Utilities Commission, the New Hampshire Public Utilities Commission, the New York Public Service Commission, the North Carolina Utilities Commission, the Tennessee Public Utility Commission, and the Virginia State Corporation Commission (collectively, the “State Commissions”) lack jurisdiction to designate TruConnect as an ETC, the Commission, under Section 214(e)(6) of the Act, has the authority to consider and grant this request.³

² The Commission placed the Original Sage ETC Petition on Public Notice (DA 13-1901) released September 16, 2013.

³ See 47 U.S.C. § 214(e)(6).

As demonstrated herein, and as certified in **Exhibit 1** attached hereto, TruConnect satisfies all the statutory and regulatory requirements for designation as an ETC in the Non-Jurisdictional States, including the requirements outlined in the FCC's *Lifeline and Link Up Reform Order*⁴ and *Lifeline Modernization Order*.⁵ TruConnect will offer all services supported by the universal service program throughout its designated service areas in the Non-Jurisdictional States. Grant of TruConnect's request, therefore, will promote the public interest by providing customers in the Non-Jurisdictional States with low prices and higher quality wireless services.

Rapid grant of TruConnect's request would advance the public interest because it would enable the Company to provide affordable and quality telecommunications services to a broad range of low-income consumers in the Non-Jurisdictional States who will benefit from the increased choice of service providers and service options resulting from a grant of TruConnect's ETC designation request. In addition, expanding customers' access to Lifeline service providers in these Non-Jurisdictional States is a wise decision as the FCC embarks upon new telehealth initiatives. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Amended Petition for ETC designation, so that low-income customers in the Non-Jurisdictional States can benefit from TruConnect's variety of high-quality Lifeline plans without any unnecessary delay.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Amended Petition should be addressed to:

Lance J.M. Steinhart
Managing Attorney

⁴ See supra note 1.

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) ("*Lifeline Modernization Order*").

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II. BACKGROUND

A. Company Overview

TruConnect is a Texas Limited Liability Company.⁶ Its principal office is located at 1149 S. Hill Street, Suite H-400, Los Angeles, California 90015. Sage Telecom Communications, LLC is a subsidiary of TSC Acquisition Corporation (“TSC”) and was formerly known as Sage Telecom, Inc. before a corporate restructuring in 2012. TSC also owns TruConnect Communications, Inc., (“TruConnect, Inc.”) formerly Telscape Communications, Inc., and the owners of TSC separately own TruConnect Mobile, LLC (“TruConnect Mobile”), which sells mobile hotspot devices and low-cost monthly data plans; as well as TruConnect Technologies, LLC, a mobile data analytics company that develops data intelligence products and services for wireless carriers, cable operators, content providers, and application developers; and TruConnect Marketing, LLC. Sage d/b/a TruConnect and TruConnect, Inc. are resellers of commercial mobile radio service (“CMRS”).

TruConnect provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of facilities-based providers, primarily T-Mobile USA, Inc. (“T-Mobile”), and also Sprint Spectrum, L.P. (“Sprint”) and Verizon Wireless (“Verizon”), (collectively, “Underlying Carriers”) on a wholesale basis to offer nationwide service. TruConnect obtains from its Underlying Carriers the network infrastructure and wireless transmission facilities

⁶ The Company was organized in the State of Texas on December 5, 2012.

to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”), much like TracFone Wireless, Inc. (“TracFone”), Virgin Mobile USA, L.P. (“Virgin Mobile”), and i-wireless, LLC (“i-wireless”) each of which has been granted ETC status by the Commission.⁷ TruConnect is currently designated as a wireless ETC in Arkansas, California, Colorado, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, South Carolina, Texas, Utah, West Virginia and Wisconsin.⁸ Sage d/b/a TruConnect has applications for ETC designation pending with the FCC and with the state public utility commissions in Arizona and Illinois.

TruConnect’s prepaid wireless services are affordable, easy to use, and attractive to low-income consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. TruConnect offers consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of its customers in other states, TruConnect anticipates that many of its customers will be from low-

⁷ See *TracFone Wireless, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of New York, Virginia, Connecticut, Massachusetts, Alabama, North Carolina, Tennessee, Delaware, New Hampshire, Pennsylvania, and the District of Columbia*, CC Docket No. 96-45, Order, 23 FCC Rcd 6206 (2008) (“*TracFone ETC Order*”), the Commission had previously granted TracFone forbearance from the facilities requirement for ETC designation, permitting TracFone to offer the supported services via resale only; see also *Petition of Virgin Mobile USA, L.P. for Forbearance from 47 U.C.S. § 214(e)(1)(A) and Petition for ETC Designation in New York, Virginia, North Carolina, and Tennessee*, CC Docket No. 96-45, Order, 24 FCC Rcd 3381 (2009) (“*Virgin Mobile Order*”), the *Virgin Mobile Order* contained both the forbearance analysis and ETC designation; See also *i-wireless, LLC Amended Petition for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia*, WC Docket No. 09-197, Order, 27 FCC Rcd 6263 (2012) (“*i-wireless ETC Order*”).

⁸ The Company operates under the TruConnect, Inc. ETC designation in California; all other state designations are held by Sage d/b/a TruConnect.

income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. TruConnect does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless plans—including broadband plans—to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, TruConnect will expand the availability of wireless and broadband services to many more consumers, which is the principal reason that Congress created the universal service program.

III. THE COMMISSION HAS AUTHORITY TO PERFORM THE ETC DESIGNATION

Pursuant to Section 214(e)(6), the Commission may designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission.”⁹ The Commission has established that a carrier must demonstrate that it “is not subject to the jurisdiction of a state commission” before it may consider an application for ETC designation.¹⁰ The Commission also has stated that any carrier seeking ETC designation from it must provide the Commission with an “affirmative statement” from the state PUC that it lacks jurisdiction to perform the ETC designation.”¹¹

⁹ See 47 U.S.C. § 214(e)(6).

¹⁰ See *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, Public Notice, 12 FCC Rcd 22947, 22948 (1997).

¹¹ See *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12264 ¶ 113 (2000).

As evidenced by the statements attached hereto as **Exhibit 2**, the State Commissions in the Non-Jurisdictional States have each specifically and affirmatively denied jurisdiction over CMRS providers for purposes of granting ETC status:

- a) The Alabama Public Service Commission issued an order finding that its "jurisdiction to grant Eligible Telecommunications Carrier status for universal service purposes does not extend to providers of cellular services, broadband personal communications services, and commercial radio services," and that "wireless providers seeking ETC status should pursue their designation request with the FCC."
- b) The Connecticut Public Utilities Regulatory Authority (formerly Department of Public Utility Control) provided a letter confirming that it lacks jurisdiction over wireless ETC petitions.
- c) The Delaware Public Service Commission issued an order clarifying that as a "federal default state" it does not administer its own ETC program.
- d) The District of Columbia Public Service Commission confirmed by letter that it lacks jurisdiction to designate wireless carriers as ETCs.
- e) The Florida Public Service Commission acknowledged by letter that "the revision to Chapter 364, Florida Statutes, changed the Commission's jurisdiction regarding telecommunications companies." The letter confirmed that "the Federal Communications Commission, rather than this Commission is the appropriate agency to consider for ETC status."
- f) The Maine Public Service Commission issued an order clarifying that it would "no longer certify carriers that apply for ETC designation for the sole purpose of offering Lifeline, Link-Up, or other Low-income program benefits. Going forward, such carriers will apply to the Federal Communications Commission (FCC) for ETC designation."
- g) The General Counsel of the New Hampshire Public Utilities Commission issued a letter confirming that the PUC lacks jurisdiction to consider petitions for ETC status filed by mobile radio communication carriers.
- h) The New York Public Service Commission confirmed by letter that it lacks jurisdiction to entertain a wireless carrier's ETC petition.
- i) The North Carolina Utilities Commission released an Order concluding that "the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC."
- j) The Tennessee Public Utility Commission (formerly Tennessee Regulatory Authority) issued an order finding that its statutory "lack of jurisdiction over CMRS providers" precludes it from processing ETC petitions.
- k) The Virginia State Corporation Commission issued an order stating that it "has not asserted jurisdiction over CMRS carriers" and that wireless ETC applicants "should apply to the Federal Communications Commission."

Accordingly, for each of the Non-Jurisdictional States, TruConnect is “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission.”¹² Therefore, with respect to each of the above states, TruConnect requests that the Commission exercise its authority under Section 214(e)(6) and designate TruConnect as an ETC.

A. The Limited Designation Request is Consistent with Commission Precedent

TruConnect’s request for ETC designation solely to participate in the Lifeline program is consistent with the Commission’s decisions conditionally designating TracFone Wireless, Virgin Mobile, and i-wireless, LLC as ETCs in several states.¹³ In its decisions, the Commission determined that the requests of these three (3) prepaid wireless resellers satisfied all of the necessary eligibility requirements and that designation would serve the public interest.¹⁴ The Commission specifically noted in the TracFone, Virgin Mobile, and i-wireless Orders that designation of prepaid wireless providers as ETCs will provide a variety of benefits to low-income consumers, including increased consumer choice, high-quality service offerings and mobile access to emergency services on wireless devices.¹⁵

The i-wireless ETC Order was the most recent ETC designation issued by the Commission in June 2012; the FCC has not processed any pending ETC petitions since that time—over six (6) years. By this inaction, the FCC continues to favor three (3) particular providers, ultimately putting customers in the Non-Jurisdictional States at a disadvantage compared to other states across the U.S. that have allowed competition.

¹² 47 U.S.C. § 214(e)(6).

¹³ See *supra* note 7.

¹⁴ See *TracFone ETC Order* ¶ 15; *Virgin Mobile Order* ¶ 38, and *i-wireless ETC Order* ¶¶ 11, 27-28.

¹⁵ See *Id.*

TruConnect requests that the Commission expeditiously process its pending ETC petition so that it can quickly join TracFone, Virgin Mobile and i-wireless in providing qualifying low-income customers in the Non-Jurisdictional States with affordable USF-supported Lifeline wireless services. Designation of TruConnect as ETC is a significant step towards ensuring that all customers, particularly low-income customers, share in the many benefits associated with access to affordable wireless telecommunications services, and would help to close the widening gap for wireless and broadband services. The Commission has found that voice service has “become crucial to full participation in our society and economy, which are increasingly dependent upon the rapid exchange of information,”¹⁶ and recently called the Internet “today’s vital communications network...the most powerful and pervasive platform in our Nation’s history.”¹⁷ As noted in a study sponsored by the Massachusetts Institute of Technology’s Legatum Center for Development and Entrepreneurship and New Millennium Research Council, low-income customers receive significant economic and social benefits from wireless services, including enhanced productivity, increased economic opportunity, and broader access to emergency and safety services.¹⁸

IV. TRUCONNECT SATISFIES THE REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.201

Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own

¹⁶ See *Lifeline and Link Up Reform Order* at ¶ 12.

¹⁷ See *Lifeline Modernization Order* ¶ 1.

¹⁸ Nicholas P. Sullivan, New Millennium Research, *Cell Phones Provide Significant Economic Gains for Low-Income American Households: A Review of Literature and Data from Two New Surveys*, (April 2008), available at http://newmillenniumresearch.org/archive/Sullivan_Report_032608.pdf.

facilities and the resale of another carrier's services, except where the FCC has forbore from the "own facilities" requirement. Applicants also must commit to advertise the availability and rates of such services.¹⁹ As detailed below, TruConnect satisfies the above-listed requirements.

A. TruConnect Is a Common Carrier

CMRS providers like TruConnect are treated as common carriers.²⁰

B. TruConnect Will Provide Service Consistent with the FCC's Grant of Forbearance from Section 214's Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as TruConnect. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the "own-facilities" requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:²¹

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the

¹⁹ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

²⁰ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); see also *PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.")

²¹ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

TruConnect has availed itself of the FCC’s grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, the Company filed its Compliance Plan which the FCC approved on December 26, 2012.²² A copy of the approved Compliance Plan is attached hereto as **Exhibit 3**. TruConnect commits to providing Lifeline service in the Non-Jurisdictional States in accordance with the Compliance Plan and in compliance with applicable FCC rules, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

C. TruConnect Will Provide All Supported Services

Through its wholesale arrangement with underlying carriers, TruConnect is able to provide all services supported by the universal service program as detailed in Section 54.101(a) of the FCC’s Rules (47 C.F.R. § 54.101(a)) throughout the Non-Jurisdictional States as follows:

1. Voice Telephony Service

The FCC has determined that “eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in [47 C.F.R. § 54] subpart E.”²³

Voice Grade Access. TruConnect provides voice grade access to the public switched network (“PSTN”) through the purchase of wholesale CMRS services from its facilities-based

²² See FCC Public Notice DA 12-2063, https://apps.fcc.gov/edocs_public/attachmatch/DA-12-2063A1_Rcd.pdf.

²³ See 47 C.F.R. § 54.101(a).

underlying carriers.

Local Usage. TruConnect offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. TruConnect provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. TruConnect also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.²⁴ "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."²⁵ Nonetheless, TruConnect's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. TruConnect's service, moreover, is not offered on a distance-sensitive basis and local and domestic long-distance minutes are treated the same.

2. Broadband Internet Access Service

The FCC has stated that broadband internet access service ("BIAS") consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."²⁶ TruConnect will provide BIAS to low-income consumers via resale of its underlying carriers'

²⁴ See *Lifeline and Link Up Reform Order* at ¶ 367.

²⁵ See *Lifeline and Link Up Reform Order* at ¶ 49.

²⁶ See 47 C.F.R. § 8.2(a).

mobile services.

D. TruConnect Will Advertise the Availability of Supported Services

TruConnect will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R § 54.201(d)(2). TruConnect's advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined in the Company's Compliance Plan.²⁷ TruConnect will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as print advertisements, direct marketing, social media and the Internet.²⁸ The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. TruConnect may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

TruConnect will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service: (a) that the service is a Lifeline-supported service; (b) that Lifeline is a government benefit program; (c) that only eligible consumers may enroll in the program; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. TruConnect will prepare printed material that will explain the documentation necessary for enrollment, and the details of the Company's plans, and will provide such information on its website. Such material and website information, as well as its application, will make clear that willfully making false

²⁷ See **Exhibit 3**, section (4). See also *Lifeline and Link Up Reform Order* at Section VII.F.

²⁸ See attached **Exhibit 4** for a sample advertisement.

statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. For broadcast advertisements and outdoor signage, such as billboards, and any other situation in which inclusion of documentation information and warnings against willful false statements are impractical, TruConnect will provide the URL link for the information disclosure page on its website. Additionally, TruConnect will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

E. TruConnect Requests Designation Throughout Its Service Area

Consistent with prior orders granting other MVNOs ETC status,²⁹ TruConnect requests ETC designation for its entire service area in Alabama, Connecticut, Delaware, District of Columbia, Florida, Maine, New Hampshire, North Carolina, New York, Tennessee and Virginia (i.e. the area served by the facilities-based carriers from whom it obtains wholesale service), but excluding any Tribal Areas.³⁰ TruConnect understands that its service area may overlap with several rural carriers' service areas but maintains that the public interest factors described below justify its designation in these service areas, especially since it only seeks ETC designation for purposes of participation in the Lifeline program.

V. TRUCONNECT SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202

TruConnect meets the additional requirements for ETC designation set forth in Section 54.202 of the FCC's rules as follows.

A. Commitment to Comply with Applicable Service Requirements

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification,

²⁹ See *TracFone ETC Order*, *Virgin Mobile Order* and *i-wireless ETC Order*, *supra* note 7.

³⁰ See **Exhibit 5** for the service areas of the non-rural and rural telephone companies that TruConnect's authorized service area covers.

TruConnect commits to comply with the service requirements applicable to the low-income support that it receives. Because TruConnect seeks ETC designation in order to provide supported services only under subpart E of Part 54 of the Commission's Rules, submission of a five-year plan under 47 C.F.R. § 54.202(a)(1)(ii) is not required. TruConnect commits that its Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408—for voice, mobile broadband, and equipment—including as they change going forward.³¹ TruConnect's Lifeline-supported broadband services will meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband service speed in addition to data usage allowance, and TruConnect will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

In compliance with ETC reporting requirements, TruConnect will submit annually to the Administrator (USAC), and provide a copy to the Commission, its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e. FCC Form 555), as well as its annual report pursuant to 47 C.F.R. § 54.422 (i.e. FCC Form 481). TruConnect will retain documentation of Lifeline eligibility in accordance with applicable rules (i.e. 47 C.F.R. §§ 54.410 and 54.417) and will further comply with the audit requirements set forth in 47 C.F.R. § 54.420.

³¹ For purposes of voice-only support, the FCC requires Lifeline providers to offer 1,000 voice minutes per month beginning December 1, 2018. The Lifeline support offered for voice-only services will decline to \$7.25 per month beginning December 1, 2019 and will further decline to \$5.25 as of December 1, 2020. With respect to mobile broadband, the minimum standard data usage allowance for is 2 GB per month effective December 1, 2018. Further, beginning December 1, 2019, the minimum per month data usage allowance for mobile broadband will be determined, and updated thereafter, based on a detailed procedure established by the FCC. TruConnect commits that it will offer plan options which meet either the voice or broadband minimum service standards—or, as is currently the case, a bundle plan which meets both—and when support for voice-only service declines, TruConnect will bundle voice service with a plan that meets the broadband minimum service standards to ensure customers receive the full \$9.25 Lifeline support.

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. §54.202(a)(2) and 83 Ill. Admin. § 736.305, TruConnect has the ability to remain functional in emergency situations. Through its Underlying Carriers, TruConnect provides to its customers the same ability to remain functional in emergency situations as currently provided by the Underlying Carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. TruConnect's Underlying Carriers have provisions to meet emergencies resulting from failure of commercial or power service, sudden and prolonged increase in traffic, illness of personnel, fire, storm, or other natural disasters. Indeed, these carriers have repeatedly certified to the FCC that their networks function in emergency situations.³² Furthermore, the Company is subject to its own 911 requirements in 47 C.F.R. 20.18(m), and has committed to specific 911 and E911-related requirements – including with respect to E911 handsets – in its Compliance Plan.

C. Commitment to Consumer Protection and Service Quality

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service.³³ The Company hereby commits to comply with the CTIA Consumer Code for Wireless Service. See attached **Exhibit 6** for a

³² See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (rel. Aug. 16, 2012).

³³ See 47 C.F.R. § 54.202(a)(3).

demonstration of how TruConnect currently complies with the CTIA Code in other jurisdictions.

TruConnect is dedicated to quality customer service and care and will make every effort to expeditiously resolve any complaints. Lifeline customers can reach the Company's Customer Service department via phone (by dialing 611 or TruConnect's toll-free number, 1-800-430-0443), by mail, or online at TruConnect's website (www.truconnect.com). Live representatives are available 7am - 11pm CST Mon-Sat, both by phone and via online chat.

D. Financial and Technical Capability

In accordance with 47 CFR §54.202(a)(4), TruConnect is financially and technically capable of providing Lifeline-supported services. The Company has been offering telecommunications service since 1998 and began providing non-Lifeline wireless service in October 2012 and Lifeline-supported wireless service in May 2013. TruConnect already successfully provides wireless services nationwide, including Lifeline services in seventeen (17) states.³⁴ TruConnect has not been subject to enforcement actions, and has only been subject to one (1) ETC revocation proceeding as explained in the footnote below (and has since had the respective ETC designation re-instated).³⁵ The Company has operated as a telecommunications carrier for

³⁴ TruConnect is in the process, over the next few months, of launching its wireless Lifeline service in the remaining states in which it has been designated as an ETC. The Company provides service in California through its affiliate, TruConnect Communications, Inc.—one of the longest-operating wireless ETCs in California, with almost 170,000 Lifeline subscribers.

³⁵ In a Memorandum dated October 18, 2017 in Docket No. 3005-TI-102, Wisconsin Commission ("WI PSC") Staff noted concerns that the Company was not providing Lifeline service in Wisconsin and may have failed to inform the WI PSC of changes to contact numbers and web sites. TruConnect acknowledges that the Company should have informed the WI PSC of changes to contact numbers and web sites, a process which was overlooked due to internal restructuring and employee turnover in 2016 and 2017. TruConnect has put measures in place to ensure consistent, timely compliance going forward by contracting with the following independent third-party compliance vendors: FAS Tek Compliance Solutions, Inc. for ongoing regulatory compliance and reporting; Expert Telecom Compliance, Inc. for ETC-specific compliance; Telecom Professionals, Inc. for ongoing sales and use tax and E-911 compliance; and Lance J.M. Steinhart, P.C. for legal and regulatory services, including maintaining current

twenty years and has never had to file for bankruptcy protection, and is supported by the resources of its parent, TSC Acquisition Corporation (“TSC”). TruConnect does not, and does not intend to, offer exclusively Lifeline-supported services—and is therefore not exclusively dependent on USAC for its revenue. TruConnect is a profitable, liquid company, fully capable of honoring all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of TruConnect has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.³⁶ TruConnect will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carriers.

In addition to retail and Lifeline prepaid wireless telephone services, TruConnect provides the following non-Lifeline services: “TruText,” a free text messaging and calling app that allows customers to send and receive text messages and voice calls using a Wi-Fi connection; and “Internet on the Go” (“IOTG”) which allows customers to purchase a mobile Wi-Fi hotspot device and pair it with a monthly low-cost data plan in order to provide broadband

contact information with regulatory entities, as well as legal advice regarding operations, marketing and compliance, rate changes and service area expansions, advice regarding state and federal ETC Lifeline rulemakings and rule changes, and general monitoring of Lifeline notices and proceedings that could potentially affect TruConnect. These third-party vendors will provide industry expertise and add a layer of accountability and protection regardless of unforeseen internal personnel changes, although in addition, the Company has dedicated staff to work with these aforementioned compliance providers. Regrettably, as a result of TruConnect not updating its address with the WI PSC, the Company did not receive notice of the proceeding and proposed revocation of its ETC designation, and therefore the Company’s Wisconsin ETC designation was revoked effective December 19, 2017 without input from TruConnect. TruConnect refiled for ETC designation in Wisconsin and was approved on a conditional basis effective August 28, 2018 (Docket 3005-TI-103).

³⁶ See **Exhibit 7** for key management bios.

access both at home and on-the-go.³⁷ While the TruText service is free to the consumer, TruConnect receives revenue from advertisements and by offering consumers low cost calling and texting plans. Even without taking TruText into the equation, TruConnect's combined prepaid and IOTG customers currently constitute over 20% of total Lifeline, prepaid and IOTG customers in eleven (11) of the thirteen (13) states in which the Company currently has Lifeline customers (and removing California from the equation, the state with TruConnect's largest Lifeline customer base by far, the overall ratio is over 20% combined for the remaining twelve (12) states in question). With TruText taken into account, Lifeline customers make up only about 50% of TruConnect customers overall.

E. Proposed Lifeline Offering

TruConnect intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and/or broadband usage at all price points. The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other TruConnect prepaid customers, but at discounted Lifeline rates. Attached hereto as **Exhibit 8** is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers will receive 1,000 voice minutes, unlimited text messages, and 2 gigabytes (GB) of data per month (i.e. the minimum service standards for both voice *and* broadband as of December 1, 2018) at a net cost of \$0.00 after application of Lifeline support, or choose from plan options with unlimited voice minutes and higher amounts

³⁷ TruConnect's prepaid, Lifeline, and TruText services are marketed on the Company's website, www.truconnect.com, and the website also directs customers to <https://www.internet-go.com/> for TruConnect's IOTG services.

of data for discounted rates between \$15.00 to \$35.00 per month.³⁸ Customers will also be able to purchase additional minutes or data as needed.

In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will receive a free handset or SIM card, as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Any devices provided by the Company to Lifeline customers will meet the equipment requirements set forth in 47 C.F.R. § 54.408. Customers may use their minutes to place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. As **Exhibit 8** demonstrates, the Company's Lifeline offering will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of eligible customers that are comparable in minutes and features to those available to post-paid wireless subscribers—but at low Lifeline rates and without the burden of credit checks, activation fees or service contracts. TruConnect's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

VI. TRUCONNECT WILL COMPLY WITH CERTIFICATION AND VERIFICATION REQUIREMENTS AND MEASURES TO PREVENT WASTE, FRAUD AND ABUSE

TruConnect will certify and verify consumer eligibility in accordance with the Company's approved Compliance Plan, with modifications to comply with changes to FCC rules since approval thereof (i.e. as a result of the *Lifeline Modernization Order*) and to account for

³⁸ The Company's terms and conditions of service are maintained on its website, at <https://www.truconnect.com/legal-terms-and-conditions-personal/>.

future rules changes as necessary going forward.

A. Consumer Eligibility and Enrollment

Customers interested in Lifeline service must complete and sign an application form, at sign up and annually thereafter, which contains the information and certifications required by 47 C.F.R. § 54.410(d). As of July 1, 2018, TruConnect utilizes the FCC's required universal Lifeline application forms, which provide the disclosures required and collect the information required by FCC rules.³⁹ Regardless of enrollment method, processing of consumers' applications, including review of all application forms and relevant documentation, is performed under the Company's supervision by managers experienced in the administration of the Lifeline program. Consumers who do not complete the application process in person must return the signed application and support documentation to the Company (or National Verifier or state administrator, where applicable) by mail, fax, email, or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, which meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.⁴⁰

TruConnect will certify and verify consumer eligibility, both initially and annually, in accordance with 47 C.F.R. § 54.410, utilizing the streamlined eligibility criteria implemented by the *Lifeline Modernization Order* (see 47 C.F.R. § 54.409). Prior to enrolling a new subscriber, TruConnect will check the eligibility of applicants by accessing state or federal electronic eligibility databases, where available. If a database is used to establish eligibility, TruConnect will not require documentation of the applicant's participation in a qualifying federal program;

³⁹ See FCC Public Notice released Feb. 20, 2018 (DA 18-161); The Universal Consumer Forms are available at <https://www.usac.org/li/tools/forms/default.aspx>.

⁴⁰ See *Lifeline and Link Up Reform Order* at ¶ 168.

instead, TruConnect will note in its records what specific data was relied upon to confirm the applicant's initial eligibility for Lifeline. However, in states where there is no state administrator, the state commission or other state or federal agency is not making eligibility determinations, and there is no automated means for TruConnect to check electronic databases for eligibility, TruConnect will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available. TruConnect will require acceptable documentation both for income eligibility and program eligibility, and will retain such proof documentation in its records in accordance with FCC rules.

NLAD. TruConnect also complies with the requirements of the National Lifeline Accountability Database ("NLAD") and section 54.404 of the FCC's rules. As such, the Company (or Eligibility Administrator, where applicable) queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from TruConnect or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. If TruConnect determines that an individual at the applicant's address is currently receiving Lifeline-supported service, TruConnect will allow applicants to demonstrate that the applicant and the existing subscriber are part of different households, if that is the case, by completing USAC's universal One-Per-Household Worksheet.

National Verifier. The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier ("National Verifier"), which transfers the responsibility of eligibility determination away from Lifeline providers.⁴¹ TruConnect will

⁴¹ See *Lifeline Modernization Order*, section III.C.

rely on the National Verifier, once in place in each respective state, to determine initial and ongoing eligibility of Lifeline subscribers in the Non-Jurisdictional States.

Recertification. TruConnect will re-certify the continued eligibility of all of its subscribers in accordance with 47 C.F.R. § 54.410(f) by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility. The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact TruConnect. TruConnect will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d). TruConnect understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications. Alternatively, where a database containing consumer eligibility data is available, TruConnect (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. TruConnect will continue to annually certify the continued eligibility of its entire subscriber base, or rely upon the National Verifier to do so once implemented in each respective state.

De-Enrollment. TruConnect will de-enroll customers for the reasons set forth and in accordance with the notification and timing procedures set forth in 47 C.F.R. § 54.405(e), including for instances of failed annual recertification; non-usage as detailed in section B.1 below; determination of duplicative support; if TruConnect has a reasonable basis to believe that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer under §54.409; or simply due to elective subscriber request to de-enroll.

B. Additional Measures to Prevent Waste, Fraud and Abuse

FCC Reforms, including implementation of the NLAD and impending launch of the National Verifier, have already done much to prevent waste, fraud and abuse of the Lifeline program. As described previously, TruConnect clearly explains all required disclosures about the Lifeline program (i.e. 47 C.F.R. § 54.405(c)-(d) and 47 C.F.R. § 54.410(d)(1)) to applicants during the enrollment process, reinforcing the limitation of one Lifeline benefit per household.

To further protect the integrity of the USF, TruConnect contracts with an objective third-party vendor, currently CGM, LLC, a Georgia-based lifeline service bureau, to process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: all subsidy requests are compared to underlying network status to ensure that subsidies are requested only for active lines. Moreover, TruConnect has implemented an internal auditing process to review NLAD and CGM findings as a final layer of fraud prevention. Through the processes described above, TruConnect ensures that it does not over-request from support funds.

1. Subscriber Usage

Furthermore, TruConnect has updated its activation and usage policy to be consistent with changes in federal regulations. As such, the Company will not seek USF reimbursement for inactive subscribers and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period

set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), TruConnect will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

2. Distribution and Agents

TruConnect maintains a very rigorous and highly automated process for verifying the identity and eligibility of customers that apply for Lifeline service. The vast majority of its applications are completed online. TruConnect's process includes multiple checks against NLAD, USPS, Melissa, Lexis/Nexis, and CGM databases. TruConnect has a compliance staff that conducts a review of each Lifeline application received, and it only ships phones to a customer's verified residential address. TruConnect understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases TruConnect remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.⁴² If and when TruConnect utilizes third party agents on a limited basis, the automated processes above, combined with real-time and back-end review internally by the Company, mitigates potential for agent fraud. All employees and agents alike are trained regarding the eligibility and certification requirements in FCC rules. Further, TruConnect adheres to an agent commission structure that only provides incentives to enroll eligible subscribers, i.e. payment only after a customer is successfully included on a reimbursement request, and TruConnect has a zero-tolerance policy for fraud. TruConnect is responsible for overseeing and finalizing every

⁴² See *Lifeline and Link Up Reform Order* at ¶ 110.

Lifeline application prior to approving the application and including that customer on a request for reimbursement, and thus the Company always “deals directly” with its customers to certify and verify customers’ Lifeline eligibility. TruConnect maintains the highest standards of integrity in its operations, sales and customer verification processes, and shares the FCC’s goals to eradicate waste, fraud and abuse in the Lifeline program.

VII. DESIGNATION OF TRUCONNECT AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.⁴³ Designation of TruConnect as an ETC in the Non-Jurisdictional States will further the public interest by providing low-income consumers with low prices and high quality services. Specifically, the Company will offer prepaid low cost wireless service to low-income consumers, increasing consumer choice and access to telephone and broadband services through the availability of a new ETC designee in the Non-Jurisdictional States. Many low-income customers have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers. Furthermore, TruConnect is prepared to offer its customers telehealth applications enabling customers to more readily access world-class healthcare consistent with the FCC’s recent inquiries on telehealth.

According to USAC,⁴⁴ and as summarized in **Exhibit 9**, the 2017 estimated Lifeline

⁴³ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

⁴⁴ <https://www.usac.org/li/about/process-overview/stats/participation.aspx>

adoption rate (“take rate”) in the Non-Jurisdictional States ranges from only 11% to 29% (TruConnect estimates the current take rate to be even lower in many cases), and there is an estimated total of more than 9.5 million unserved Lifeline-eligible customers. TruConnect is ready, capable, and willing to serve these customers. The Commission has noted that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”⁴⁵ Mobile Lifeline service is essential to bridging the digital divide as well as offering low-income Americans better access to healthcare through telemedicine. Given this context, designating TruConnect as an ETC would significantly benefit low-income consumers eligible for Lifeline service in the Non-Jurisdictional States—the intended beneficiaries of universal service.

A. Advantages of TruConnect’s Service Offering

The public interest benefits of the Company’s wireless Lifeline service include larger local calling areas (as compared to traditional wireline carriers); the convenience, portability and security afforded by mobile telephone service; the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge; the opportunity for customers to receive both the minimum service standards for voice *and* broadband usage within the same rate plan; the ability of users to use the supported service to send and receive “SMS” or text messages; the ability for customers to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted (and the courtesy of free low-balance alerts); the opportunity for customers to receive service without going through a credit

⁴⁵ See *Lifeline Modernization Order* ¶ 2.

check or deposit requirement, or committing to a long-term service contract; and access to 911 and E911 (where available) service in accordance with current FCC requirements. Additionally, the inclusion of domestic long distance as a part of TruConnect's flat-rate wireless offerings allows consumers to avoid the risks of becoming burdened with significant and unexpected per-minute charges for domestic telephone toll and overage charges.

Specifically, TruConnect's Lifeline rate plans provide more benefits than the plans of other ETCs currently on the market. While there are other plan options that provide either the minimum voice standard *or* the minimum data standard for \$0.00 after application of Lifeline support, TruConnect would be the only ETC offering both minimum service standards (i.e. 1,000 voice minutes *and* 2 GB data) for no net cost to Lifeline customers. Furthermore, TruConnect's discounted bundled plans with unlimited talk, text and data (ranging from 2.5 GB for \$15 net cost to 6 GB for \$35 net cost) are highly competitive with other ETCs and provide affordable voice and broadband access for consumers with higher usage needs.

TruConnect's Lifeline program will provide low-income residents in the Non-Jurisdictional States with the convenience and security offered by wireless services—even if their financial position deteriorates. Low-income individuals can greatly benefit from the advantages offered by the Company's Lifeline service, which provides access to wholly-supported or discounted wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. It is a commonly accepted fact that in today's market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service

providers, regardless of location. TruConnect's prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues. Providing TruConnect with the authority necessary to offer discounted Lifeline service to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

In sum, ETC designation in the Non-Jurisdictional States would enable TruConnect to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, TruConnect would provide “increased consumer choice, high-quality service offerings, and mobility,”⁴⁶ as well as the safety and security of effective 911 and E911 services.⁴⁷

B. The Benefits of Competitive Choice

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.⁴⁸ Designation of TruConnect as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.⁴⁹ Introducing TruConnect into the market as an additional wireless ETC provider in the Non-Jurisdictional States will afford low income residents a wider choice of providers and available services while enhancing a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with higher-value service offerings tailored to their needs, resulting in improved services to consumers. Increasing the competitive marketplace

⁴⁶ See *Virgin Mobile Order* ¶ 38.

⁴⁷ See *Id.* at ¶ 23.

⁴⁸ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

⁴⁹ See 47 U.S.C. § 254(b)(1).

of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as TruConnect or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, TruConnect will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier (once in place), the likelihood that TruConnect's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. TruConnect's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers. According to the FCC, "the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest," and "A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline program outweighs the potential costs."⁵⁰

⁵⁰ See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

VIII. ANTI-DRUG ABUSE CERTIFICATION

TruConnect certifies that no party to this Application is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

IX. CONCLUSION

Based on the foregoing, designation of TruConnect as an ETC in the Non-Jurisdictional States accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, TruConnect respectfully requests that the Commission promptly designate TruConnect as an ETC in the Non-Jurisdictional States for purposes of participating in the Lifeline program.

Respectfully submitted,

s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
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E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for Sage Telecom Communications, LLC
d/b/a TruConnect*

October 16, 2018

EXHIBIT 1

Certification of Company Officer

Certification

I, Nathan Johnson, hereby declare under penalty of perjury as follows:

1. I am Co-CEO of Sage Telecom Communications, LLC d/b/a TruConnect ("TruConnect"), a Texas Limited Liability Company with its principal place of business at 1149 S. Hill Street, Suite H-400, Los Angeles, California 90015.
2. I have read the foregoing Amended Petition and confirm the information contained therein to be true and correct to the best of my knowledge.
3. TruConnect certifies that it will comply with the service requirements applicable to the support that it receives.
4. To the best of my knowledge, TruConnect, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) are not subject to denial of federal benefits, including Federal Communications Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 12, 2018



Nathan Johnson

EXHIBIT 2

State Commission Statements Regarding Jurisdiction

Alabama Public Service Commission

Orders

PINE BELT CELLULAR, INC. and PINE
BELT PCS, INC.,

Joint Petitioners

PETITION: For ETC status and/or
clarification regarding the jurisdiction of
the Commission to grant ETC status to
wireless carriers.

DOCKET U-4400

ORDER

BY THE COMMISSION:

In a joint pleading submitted on September 11, 2001, Pine Belt Cellular, Inc. and Pine Belt PCS, Inc. (collectively referred to as "Pine Belt") each notified the Commission of their desire to be designated as universal service eligible telecommunications carriers ("ETCs") for purposes of providing wireless ETC service in certain of the non-rural Alabama wireline service territories of BellSouth Telecommunications, Inc. ("BellSouth") and Verizon South, Inc. ("Verizon"). The Pine Belt companies noted their affiliation with Pine Belt Telephone Company, a provider of wireline telephone service in rural Alabama, but clarified that they exclusively provide cellular telecommunications and personal communications (collectively referred to as "CMRS" or "wireless") services in their respective service areas in Alabama in accordance with licenses granted by the Federal Communications Commission ("FCC"). The pivotal issue raised in the joint pleading of Pine Belt companies is whether the Commission will assert jurisdiction in this matter given the wireless status of the Pine Belt companies.

As noted in the filing of the Pine Belt companies, state Commissions have primary responsibility for the designation of eligible telecommunications carriers in their respective jurisdictions for universal service purposes pursuant to 47 USC §214(e). The Commission indeed established guidelines and requirements for attaining ETC status in this jurisdiction pursuant to notice issued on October 31, 1997.

For carriers not subject to state jurisdiction, however, §214(e)(6) of the Telecommunications Act of 1996 provides that the FCC shall, upon request, designate such carriers as ETCs in non-rural

service territories if said carriers meet the requirements of §214(e)(1). In an FCC Public Notice released December 29, 1997 (FCC 97-419) entitled "Procedures for FCC designation of Eligible Telecommunications Carriers pursuant to §214(e)(6) of the Telecommunications Act", the FCC required each applicant seeking ETC designation from the FCC to provide, among other things, "a certification and brief statement of supporting facts demonstrating that the Petitioner is not subject to the jurisdiction of a state Commission."

The Pine Belt companies enclosed with their joint pleading completed ETC application forms as developed by the Commission. In the event the Commission determines that it does not have jurisdiction to act on the Pine Belt request for ETC status, however, the Pine Belt companies seek an affirmative written statement from the Commission indicating that the Commission lacks jurisdiction to grant them ETC status as wireless carriers.

The issue concerning the APSC's jurisdiction over providers of cellular services, broadband personal communications services, and commercial mobile radio services is one that was rather recently addressed by the Commission. The Commission indeed issued a Declaratory Ruling on March 2, 2000, in Docket 26414 which concluded that as the result of certain amendments to the Code of Alabama, 1975 §40-21-120(2) and (1)(a) effectuated in June of 1999, the APSC has no authority to regulate, *in any respect*, cellular services, broadband personal communications services and commercial mobile radio services in Alabama. Given the aforementioned conclusions by the Commission, it seems rather clear that the Commission has no jurisdiction to take action on the Application of the Pine Belt companies for ETC status in this jurisdiction. The Pine Belt companies and all other wireless providers seeking ETC status should pursue their ETC designation request with the FCC as provided by 47 USC §214(e)(6).

IT IS, THEREFORE, ORDERED BY THE COMMISSION, That the Commission's jurisdiction to grant Eligible Telecommunications Carrier status for universal service purposes does not extend to providers of cellular services, broadband personal communications services, and commercial mobile radio services. Providers of such services seeking Eligible Telecommunications Carrier status should accordingly pursue their requests through the Federal Communications Commission.

IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DONE at Montgomery, Alabama, this 12th day of March, 2002.

ALABAMA PUBLIC SERVICE COMMISSION

Jim Sullivan, President

Jan Cook, Commissioner

George C. Wallace, Jr., Commissioner

ATTEST: A True Copy

Walter L. Thomas, Jr., Secretary



STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

August 10, 2010
In reply, please refer to:
UR:PAP

Lance J.M. Steinhart, Esquire
1720 Windward Concourse
Suite 115
Atlanta, Georgia 30005

Re: Request for Letter Clarifying Jurisdiction Over Wireless CETC Petitions

Dear Mr. Steinhart:

The Department of Public Utility Control (Department) acknowledges receipt of your July 23, 2010 letter filed on behalf of i-wireless, LLC (i-wireless) seeking clarification as to whether the Department asserts jurisdiction to designate competitive eligible telecommunications carriers (CETC) in Connecticut. According to your letter, i-wireless seeks designation as a CETC in Connecticut and believes that the Department does not assert jurisdiction to designate CETCs in the state and that carriers must apply to the Federal Communications Commission for certification.

The Department has reviewed your request and notes that it has approved requests for CETC status from wireline-based carriers. However, in the instant case, i-wireless is a mobile virtual network operator. The Department does not regulate or license mobile carrier services' rates and charges and therefore, it is not subject to the Department's jurisdiction for the purposes of designating CETC status.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

K. Santopietro (JCLW)
Kimberley J. Santopietro
Executive Secretary

Ten Franklin Square • New Britain, Connecticut 06051 • Phone: 860-827-1553 • Fax: 860-827-2613

Email: dpuc.executivesecretary@do.state.ct.us • Internet: www.state.ct.us/dpuc

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**STATE OF DELAWARE
PUBLIC SERVICE COMMISSION**

861 SILVER LAKE BOULEVARD
CANNON BUILDING, SUITE 100
DOVER, DELAWARE 19904

TELEPHONE: (302) 736-7500
FAX: (302) 739-4849

August 18, 2010

VIA E-MAIL

Lance J.M. Steinhart, P.C.
1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005

Dear Mr. Steinhart:

I received your letter on behalf of i-wireless, LLC requesting clarification on Delaware's competitive eligible telecommunication carrier process. This is to confirm that Delaware is a "default" State and, therefore, it is the FCC, not Delaware, that determines eligibility to receive the federally-subsidized price reductions. I am attaching the October 11, 2005 order in PSC Docket No. 05-016T that discusses this issue in a Verizon Delaware, Inc. docket.

I will attach these documents to an e-mail so that you will receive them expeditiously. If you would also like a hard copies of the documents by mail let me know by e-mail and I will forward them to you.

Sincerely

Janis L. Dillard
Acting Executive Director

DOCKET COPY
DO NOT REMOVE FROM OFFICE
BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF DELAWARE

IN THE MATTER OF THE APPLICATION OF)
VERIZON DELAWARE INC., TO MODIFY THE)
LIFELINE SERVICE BY ADDING AN INCOME)
QUALIFIER TO THE ELIGIBILITY CRITERIA)
(FILED JUNE 17, 2005))

PSC DOCKET NO. 05-016T

ORDER NO. 6736

This 11th day of October, 2005, the Commission determines and Orders the following:

1. In the jargon of the federal Lifeline/Link-Up program, Delaware is a "federal default State." Delaware has never, by either state law or state regulation, ordained, nor funded, a stand-alone program to provide discounts on basic telephone services charges for low-income subscribers. Consequently, it was not until 1997, when the Federal Communications Commission ("FCC") revamped the federal Lifeline/Link-Up program, that Delaware subscribers first became eligible for participation in the federal Lifeline program.¹ And given that in a "federal default State" only federally-raised monies are used to reimburse eligible carriers for the Lifeline and Link-Up discounts, it is the FCC, and not the state commission, that gets to call the tune about who should be eligible to receive these federally-subsidized price reductions.

2. Since 1997, Verizon Delaware Inc. ("VZ-DE") has been designated as an "eligible telecommunications carrier" and has offered

¹See PSC Order No. 4684 (Dec. 16, 1997) (summarizing Delaware history and electing to allow "Tier 2" federal support to eligible Delaware subscribers).

federal Lifeline discounts on the federal list of supported services.² And even though in "default" States, Lifeline is almost an exclusively federal program, VZ-DE has, since 1997, filed at the State level, tariff provisions setting forth its Lifeline offerings.³

3. In 2004, the FCC changed some of the "eligibility" rules describing which subscribers may participate in the federal Lifeline/Link-Up program.⁴ In particular, the 2004 amendments added additional programs to the list of "eligible" programs where participation confers federal default Lifeline/Link-Up eligibility.⁵ The 2004 amendments also introduced an additional eligibility criteria premised on the subscriber's household income.⁶ Eligible telecommunications carriers, such as VZ-DE, were given one year to implement this new, additional income-based eligibility criteria.⁷

4. To implement these changes prescribed by the FCC, VZ-DE initially filed revisions to the Lifeline and Link-Up portions of its

²See PSC Order No. 4680 (Dec. 17, 1997) ("ETC" designation for VZ-DE). See also PSC Dckt. No. 97-023T (initial Lifeline tariff filing by VZ-DE).

³From December 2000 through December 2003, VZ-DE offered, under its state tariff, an "expanded" Lifeline program for Delaware. The discounts under such program exceeded the Tiers 1 & 2 levels normally available in a default State. VZ-DE offered this expanded program to fulfill a condition imposed by the FCC in approving the Bell Atlantic-GTE merger. See PSC Order No. 6317 (Dec. 9, 2003) (explaining content and cause of this expanded Lifeline offering). Whether Delaware remained a "default State" during this period when VZ-DE subsidized the deeper discounts is an issue that need now be explored or resolved. This "expanded" program ended in December 2003.

⁴In the Matter of Lifeline and Link-Up, Report and Order and Further NPRM, 19 FCC Rcd. 8302 (FCC 2004) ("Lifeline Order").

⁵47 C.F.R. §§ 54.409(b) (Lifeline eligibility criteria in "default" State); 54.415(b) (Link-Up eligibility criteria in "default" State).

⁶47 C.F.R. §§ 54.409(b), 54.410 (Lifeline); 54.415(b), 54.416 (Link-Up).

⁷47 C.F.R. §§ 54.410(a)(ii), 54.416.

State tariff. These changes incorporated into the State tariff provisions the expanded list of "eligibility-conferring" programs.⁸ At the same time, the Commission Staff began discussions with VZ-DE to determine whether, under the applicable federal default rules, it was appropriate for VZ-DE to continue to include in its State tariff Lifeline provisions language that conditioned Lifeline eligibility on the subscriber foregoing the ability to purchase many optional or vertical services.⁹ Eventually, VZ-DE revised its State tariff Lifeline provisions to delete the questioned restrictions.¹⁰ Then in June 2005, VZ-DE filed another Tariff revision to reflect its implementation of the household-income criteria for eligibility for Lifeline and Link-Up discounts.¹¹ Finally, on September 9, 2005, VZ-DE submitted another set of revised tariff sheets reflecting further textual revisions, as originally suggested by Staff. In part, these final changes sought to make the State tariff's description of how VZ-DE would administer its Lifeline/Link-Up program to more closely parallel the governing federal default rules.¹²

⁸See PSC Dckt. No. 04-017T (filed July 26, 2004; eff. July 27, 2004).

⁹That restriction - limiting Lifeline subscribers to a small group of designated vertical services - had been a continual part of VZ-DE's state-tariffed Lifeline offerings since 1997. In its Lifeline Order, the FCC expressed its belief that "any restriction on the purchase of vertical services may discourage qualified consumers from enrolling and may serve as a barrier to participation in the [Lifeline] program. Lifeline Order at ¶ 53.

¹⁰See PSC Dckt. No. 05-008T (filed April 8, 2005; eff. April 16, 2005).

¹¹See PSC Dckt. No. 05-016T (filed June 17, 2005; eff. June 22, 2005).

¹²See PSC Dckt. No. 05-016T, amended tariff sheets filed on September 9, 2005 but with effective date of June 22, 2005).

5. The Commission enters this Order not so much to "approve" the various Lifeline filings made by VZ-DE but to recount the course of the filings made since the FCC changed its federal Lifeline/Link-Up program in 2004. Indeed, given that Delaware is a "default" State, VZ-DE's Lifeline/Link-Up offerings are governed more by the federal default rules than by any "approved" State tariff provision. Any State tariff provision that might conflict with a federal default rule would necessarily have to yield. However, the Commission will accept the Lifeline and Link-Up tariff filings lodged by VZ-DE. The Commission believes that VZ-DE's last submission (in September 2005) sets forth a Lifeline and Link-Up offering that is consistent with the federal default rules. However, the filing and acceptance of the State tariff provisions should not be seen as foreclosing any later challenge that VZ-DE's program falls short of the federal directives.

Now, therefore, IT IS ORDERED:

1. That, as explained in the body of this Order, the Commission accepts the tariff filings made by Verizon Delaware Inc., to implement its responsibilities to provide federal Lifeline and Link-Up in this "federal default" jurisdiction. In particular, the Commission now accepts the tariff revision filing made September 9, 2005 pertaining to the following leaves in P.S.C.-Del.-No. 1:

Section 20D, Fourteenth Revised Sheet 1 (Link-Up);

Section 20D, Fifth Revised Sheet 2 (Link-Up); and

Section 20E, Eighth Revised Sheet 2 (Lifeline).

2. That the Commission reserves the jurisdiction and authority to enter such further Orders in this matter as may be deemed necessary or proper.

BY ORDER OF THE COMMISSION:

Christa McRae

Chair

Vice Chair

John Corway

Commissioner

John R. Lee

Commissioner

[Signature]

Commissioner

ATTEST:

Norma J. Sherwood
Acting Secretary



Public Service Commission of the District of Columbia
1333 H Street, N.W., 2nd Floor, West Tower
Washington, D.C. 20005
(202) 626-5100
www.dcpssc.org

February 29, 2012

Via First Class & Electronic Mail

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C., Attorney at Law
1725 Windward Concourse, Suite 150
Alpharetta, GA 30005

Dear Mr. Steinhart:

Thank you for your February 23, 2012 letter requesting information on whether the Public Service Commission of the District of Columbia ("Commission") designates wireless telecommunications carriers as eligible telecommunications carriers ("ETC") for the purposes of receiving federal universal service funding. Please be advised that, pursuant to section 34-2006(b) of the District of Columbia Code, the Commission does not have jurisdiction over wireless carriers. Thus, the Commission has no authority to designate wireless telecommunications carriers as ETCs.

Attached please find a copy of the relevant section of the District of Columbia Code for your information. Should you need anything further, please contact Lara Walt at 202-626-9191 or lwalt@psc.dc.gov.

Sincerely,

A handwritten signature in black ink, which appears to read "Richard A. Beverly", is positioned above the printed name.

Richard A. Beverly
General Counsel

Enclosure



D.C. Council Home

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Welcome to the online source for the District of Columbia Official Code

DC ST § 34-2006

Formerly cited as DC ST 1981 § 43-1456

DC ST § 34-2006

Formerly cited as DC ST 1981 § 43-1456

District of Columbia Official Code 2001 Edition Currentness

Division V. Local Business Affairs

Title 34. Public Utilities.

Subtitle V. Telecommunications. Chapter 20. Telecommunications Competition. **→§ 34-2006. Exemptions.**

(a) This chapter shall not apply to cable television services performed pursuant to an existing cable television franchise agreement with the District of Columbia which is in effect on September 9, 1996. To the extent that a cable television company seeks to provide local exchange services within the District of Columbia, such company shall be regulated under the provisions of this chapter for their local exchange services.

(b) Pursuant to the federal Telecommunications Act of 1996, this chapter shall not apply to licensed or unlicensed wireless services authorized by the Federal Communications Commission operating in the District of Columbia.

(c) This chapter shall not:

- (1) Apply to the provision, rates, charges, or terms of service of Voice Over Internet Protocol Service or Internet Protocol-enabled Service;
- (2) Alter the authority of the Commission to enforce the requirements as are otherwise provided for, or allowed by, federal law, including the collection of Telecommunications Relay Service fees and universal service fees;
- (3) Alter the authority of the Office of Cable Television and Telecommunications with respect to the provision of video services in the District of Columbia; or
- (4) Alter the Commission's existing authority over the regulation of circuit-switched local exchange services in the District of Columbia.

CREDIT(S)

(Sept. 9, 1996, D.C. Law 11-154, § 7, 43 DCR 3736; June 5, 2008, D.C. Law 17-165, § 3(c), 55 DCR 5171.)

HISTORICAL AND STATUTORY NOTES

Prior Codifications

1981 Ed., § 43-1456.

Effect of Amendments

D.C. Law 17-165 added subsec. (c).

Legislative History of Laws

For legislative history of D.C. Law 11-154, see Historical and Statutory Notes following § 34-2001.

For Law 17-165, see notes following § 34-403.

References in Text

The federal Telecommunications Act of 1996, referred to in (b), is Pub. L. 104-104, which is codified throughout Title 47 of the United States Code.

DC CODE § 34-2006

Current through January 11, 2012

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STATE OF FLORIDA



GENERAL COUNSEL
S. CURTIS KISER
(850) 413-6199

Public Service Commission

October 24, 2011

Ms. Kasey C. Chow
Lance J.M. Steinhart, P.C.
Attorney At Law
1725 Windward Concourse
Suite 150
Alpharetta, GA 30005

Re: Undocketed – Q Link Wireless LLC's ETC Designation

Dear Ms. Chow:

We received your October 18, 2011 letter advising that Q Link Wireless LLC, a commercial mobile radio service provider, wish to seek designation as an ETC in Florida. You also requested an affirmative statement that the Florida Public Service Commission no longer assert jurisdiction to designate commercial mobile radio service providers as eligible telecommunication carriers in Florida.

This letter acknowledges that the revisions to Chapter 364, Florida Statutes, changed the Commission's jurisdiction regarding telecommunications companies. I direct your attention to Chapter 364, Florida Statutes, for the proposition that the Federal Communications Commission, rather than this Commission is the appropriate agency to consider Q Link Wireless LLC's bid for ETC status.

Sincerely,

Handwritten signature of S. Curtis Kiser.
S. Curtis Kiser
General Counsel

cc: Beth W. Salak, Director, Division of Regulatory Analysis
Robert J. Casey, Public Utilities Supervisor, Division of Regulatory Analysis
Adam J. Teitzman, Attorney Supervisor, Office of the General Counsel
Ann Cole, Commission Clerk, Office of Commission Clerk

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June 13, 2013

PUBLIC UTILITIES COMMISSION
Amendment to Standards for Designating
and Certifying Eligible
Telecommunications Carriers Qualified to
Receive Federal Universal Fund Support
(Ch. 206)

ORDER ADOPTING
AMENDED RULE AND
STATEMENT OF FACTUAL
AND POLICY BASIS

WELCH, Chairman; LITTELL and VANNOY, Commissioners

I. SUMMARY

By this Order, we adopt amendments to Chapter 206 of the Commission's rules which establishes standards for the designation and annual certification of Eligible Telecommunications Carriers (ETCs). After these amendments, the Commission will no longer certify carriers that apply for ETC designation for the sole purpose of offering Lifeline, Link-Up, or other low-income program benefits. Going forward, such carriers will apply to the Federal Communications Commission (FCC) for ETC designation.¹

II. BACKGROUND

Chapter 206, adopted by the Commission on November 20, 2007, established standards for the designation and annual certification of ETCs. The rule was created, in large measure, to supplement the federal rules for ETC designation to account for distinctions between the services provided by wireline and wireless ETCs.

Since the adoption of Chapter 206, carriers seeking ETC designation for the sole purpose of offering Lifeline, link-Up, or other low-income benefits have entered the market in ever increasing numbers.² The majority of these carriers are pre-paid wireless service providers that resell the cellular telephone service of large national carriers. These pre-paid wireless ETCs typically provide a telephone handset and offer a set number of minutes (anywhere from 68 to 250 minutes per month) to low-income

¹ This rule is a routine technical rule as defined in Title 5, chapter 375, subchapter 2-A of the Maine Revised Statutes.

² The federal Lifeline program provides a subsidy from the federal Universal Service Fund (USF) to ETCs for the purpose of providing discounted telephone service to qualifying low-income consumers. Link-Up is a federal program that provides a subsidy from the federal USF to ETCs to offset the cost of telephone service installation for low-income customers. The FCC has recently eliminated the Link-Up program for all areas of the country except Tribal Lands.

customers at no charge to the customer. The service is made "free" to the low-income customer by the application of a federal universal service fund subsidy (currently \$9.25 per month) to the monthly charge on a customer's account; a charge that exactly equals the amount of the subsidy.

When drafted, Chapter 206 did not contemplate the pre-paid Lifeline business model or the designation of "Lifeline-only" ETCs. Since the proliferation of pre-paid wireless Lifeline-only ETCs, the FCC has taken steps to standardize the certification requirements for such carriers. Notably the FCC recently enacted a requirement that a non-facilities-based wireless ETC applicant have a "compliance plan" approved by the FCC before a state commission or the FCC may designate the applicant as an ETC.³ Further, as there is no state subsidy for Lifeline service, the Commission expends substantial resources administering what is for all intents and purposes a federal program.

On April 9, 2013, we issued a Notice of Rulemaking (NOR) in this proceeding detailing the proposed amendments to Chapter 206. The Commission did not schedule a public hearing on this matter, but, pursuant to rulemaking procedures, we provided an opportunity for interested persons to request such a hearing; the Commission did not receive any public hearing requests. Additionally, we provided interested persons with an opportunity to provide written comments on the proposed amendments to Chapter 206. The deadline for submitting such comments was May 17, 2013; the Commission did not receive any comments by the deadline.

It is the view of the Commission that there is no longer any advantage to Maine consumers, financial or otherwise, for the Commission to certify ETCs that apply for the designation solely for the purpose of offering Lifeline service and receiving the federal Lifeline subsidy. Because the FCC will certify Lifeline-only ETCs, Maine consumers will continue to benefit from the availability of the services offered by those carriers.

In accordance with 5 M.R.S. § 8057-A(1), we stated in our NOR that we expect that there will be no fiscal impact from this rulemaking. Further, we stated that we expect that this rulemaking will not impose an economic burden on small businesses. We continue to believe this will be the case

III. DISCUSSION OF THE RULE AMENDMENTS

A. Section 1: Purpose

In the NOR we proposed to amend Section 1 of the rule to specify that the Commission will not designate ETCs seeking such designation solely for the purpose of receiving support to provide Lifeline, Link-Up, or other low-income services, and that carriers seeking designation for that purpose must apply to the Federal

³ In our experience, the majority of Lifeline-only wireless ETCs are non-facilities-based resellers.

Communications Commission. No comments were received regarding this proposed amendment. Therefore, we adopt the amendment to Section 1 of the rule without modification.

B. Section 2: Definitions

1. Applicant

In the NOR we proposed to amend the definition of "Applicant" to exclude carriers seeking ETC designation solely for the purpose of receiving support to provide Lifeline or other low-income services.

2. Lifeline/Link-Up

In the NOR we proposed eliminating the definition of "Lifeline/Link-up."

No comments were received regarding these proposed amendments. Therefore, we adopt these amendments to Section 2 of the rule without modification.

C. Section 3: Contents of Petition by Applicant

In addition to several non-substantive editorial changes, in the NOR we proposed eliminating the provision in Section 3 that requires ETC applicants to include in their application a statement that the ETC will advertise the availability of low-income programs such as Lifeline and Link-Up. No comments were received regarding this proposed amendment. Therefore, we adopt these amendments to Section 3 of the rule without modification.

D. Section 6: Annual Reports

In addition to several non-substantive editorial changes, in the NOR we proposed eliminating the requirement that Competitive ETCs annually certify that they have publicized the availability of low-income programs such as Lifeline and Link-Up.⁴ No comments were received regarding this proposed amendment. Therefore, we adopt these amendments to Section 6 of the rule without modification.

E. Section 7: Applicability to Carriers Designated as ETCs Before the Effective Date of this Chapter

In the NOR we proposed eliminating a superfluous section requiring submission of information by ETCs that were designated prior to December 4, 2007.

⁴ A Competitive ETC is an ETC that is not an Incumbent Local Exchange Carrier.

No comments were received regarding this proposed amendment. Therefore, we adopt this amendment to Section 7 of the rule without modification.

IV. ORDERING PARAGRAPHS

In light of the foregoing, we

O R D E R

1. That the attached Chapter 206 is hereby adopted;
2. That the Administrative Director shall notify the following of the final adoption of the attached rule:
 - a. All Local Exchange Carriers in the State of Maine;
 - b. All Eligible Telecommunications Carriers in Maine;
 - c. The Telephone Association of Maine;
 - d. All people who have filed with the Commission within the past year a written request for any Notice of Rulemaking.
3. That the Administrative Director shall send copies of this Order and the final rule:
 - a. The Secretary of State for publication in accordance with 5 M.R.S. § 8053(5); and
 - b. Executive Director of the Legislative Council.

Dated at Hallowell, Maine, this 13th day of June, 2013.

BY ORDER OF THE COMMISSION

/s/ Harry Lanphear

Harry Lanphear
Administrative Director

COMMISSIONERS VOTING FOR: Welch
 Littell
 Vannoy

NOTICE OF RIGHTS TO REVIEW OR APPEAL

5 M.R.S. § 9061 requires the Public Utilities Commission to give each party to an adjudicatory proceeding written notice of the party's rights to review or appeal of its decision made at the conclusion of the adjudicatory proceeding. The methods of review or appeal of PUC decisions at the conclusion of an adjudicatory proceeding are as follows:

1. Reconsideration of the Commission's Order may be requested under Section 11(D) of the Commission's Rules of Practice and Procedure (65-407 C.M.R.ch. 110) within **20** days of the date of the Order by filing a petition with the Commission stating the grounds upon which reconsideration is sought. Any petition not granted within **20** days from the date of filing is denied.
2. Appeal of a final decision of the Commission may be taken to the Law Court by filing, within **21** days of the date of the Order, a Notice of Appeal with the Administrative Director of the Commission, pursuant to 35-A M.R.S. § 1320(1)-(4) and the Maine Rules of Appellate Procedure.
3. Additional court review of constitutional issues or issues involving the justness or reasonableness of rates may be had by the filing of an appeal with the Law Court, pursuant to 35-A M.R.S. § 1320(5).

Note: The attachment of this Notice to a document does not indicate the Commission's view that the particular document may be subject to review or appeal. Similarly, the failure of the Commission to attach a copy of this Notice to a document does not indicate the Commission's view that the document is not subject to review or appeal.

THE STATE OF NEW HAMPSHIRE

CHAIRMAN
Thomas B. Getz

COMMISSIONERS
Clifton C. Below
Amy L. Ignatius

EXECUTIVE DIRECTOR
AND SECRETARY
Debra A. Howland



PUBLIC UTILITIES COMMISSION
21 S. Fruit Street, Suite 10
Concord, N.H. 03301-2429

Tel. (603) 271-2431

FAX (603) 271-3878

TDD Access: Relay NH
1-800-735-2964

Website:
www.puc.nh.gov

March 28, 2011

RE: ETC Certification in New Hampshire

The federal Universal Service Fund (USF) was created by the Federal Communications Commission (FCC) to promote the availability of quality services at just and reasonable rates to all consumers including low-income customers and those in high cost areas and to increase nationwide access to advanced services in schools, libraries and rural health care facilities. To qualify for universal service funding a carrier must first be certified as an Eligible Telecommunications Carrier (ETC) by the state public utilities commission or, if the state does not assert this authority, by the FCC. *See* 47 U.S.C. §214 (e).

The New Hampshire Public Utilities Commission maintains authority to determine whether landline telecommunications carriers qualify as ETCs. Pursuant to New Hampshire RSA 362:6, the Commission has no jurisdiction over mobile radio communications services. Consequently, the state declines jurisdiction over the certification of wireless carriers as ETCs, leaving that responsibility to the FCC.

Sincerely,

A handwritten signature in cursive script, appearing to read "F. Anne Ross".

F. Anne Ross
General Counsel
New Hampshire Public Utilities Commission

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350
www.dps.state.ny.us

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Commissioners



PETER MCGOWAN
General Counsel

JACLYN A. BRILLING
Secretary

July 28, 2010

TO WHOM IT MAY CONCERN:

Re: i-wireless CMRS Jurisdiction

We have received a letter from i-wireless, LLC (i-wireless), requesting a statement that the New York State Public Service Commission does not exercise jurisdiction over CMRS providers for the purpose of making determinations regarding Eligible Telecommunications Carrier designations under section 214 (e)(6) of 47 U.S.C. In response to this request, please be advised that section 5 (6)(a) of the New York State Public Service Law provides that:

Application of the provisions of this chapter to cellular telephone services is suspended unless the commission, no sooner than one year after the effective date of this subdivision, makes a determination, after notice and hearing, that suspension of the application of provisions of this chapter shall cease to the extent found necessary to protect the public interest.

The New York State Public Service Commission has not made a determination as of this date that regulation should be reinstituted under section 5 (6)(a) of the Public Service Law. Consequently, based on the representation by i-wireless that it is a mobile virtual network operator reselling wireless services, i-wireless would not be subject to New York State Public Service Commission jurisdiction for the purpose of making an Eligible Telecommunications Carrier designation.

Very truly yours,

Maureen J. McCauley
Maureen J. McCauley
Assistant Counsel

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. P-100, SUB 133c

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Designation of Carriers Eligible for Universal)
Carrier Support) ORDER GRANTING PETITION

BY THE COMMISSION: On August 22, 2003, North Carolina RSA3 Cellular Telephone Company, d/b/a Carolina West (Carolina West), a commercial mobile radio service (CMRS) provider, filed a Petition seeking an affirmative declaratory ruling that the Commission lacks jurisdiction to designate CMRS carrier eligible telecommunications carrier (ETC) status for the purposes of receiving federal universal service support.

In support of its Petition, Carolina West stated that it was a CMRS provider authorized by the Federal Communications Commission (FCC) to provide cellular mobile radio telephone service in North Carolina, and that the FCC had clearly recognized that CMRS carriers such as Carolina West may be designated as ETCs. ETC status is necessary for a provider to be eligible to receive universal service support. Section 214(e)(6) of the Telecommunications Act provides that if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC is charged with making the ETC determination. The FCC has stated that, in order for the FCC to consider requests pursuant to this provision, a carrier must provide an "affirmative statement" from the state commission or court of competent jurisdiction that the state lacks jurisdiction to perform the designation. To date, several state commissions have declined to exercise such jurisdiction.

North Carolina has excluded CMRS from the definition of "public utility." See, G.S. 62-3(23)j. Pursuant to this, the Commission issued its Order Concerning Deregulation of Wireless Providers in Docket Nos. P-100, Sub 114 and Sub 124 on August 28, 1995, concluding that the Commission no longer has jurisdiction over cellular services. Accordingly, Carolina West has now requested the Commission to issue an Order stating that it does not have jurisdiction to designate CMRS carriers ETC status for the purposes of receiving federal universal service support.

WHEREUPON, the Commission reaches the following

CONCLUSIONS

After careful consideration, the Commission concludes that it should grant Carolina West's Petition and issue an Order stating that it lacks jurisdiction to designate ETC status

for CMRS carriers. As noted above, in its August 28, 1995, Order in Docket Nos. P-100, Sub 114 and Sub 124, the Commission observed that G.S. 62-3(23)j, enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission's jurisdiction. 47 USC 3(41) defines a "state commission" as a body which "has regulatory jurisdiction with respect to the intrastate operation of carriers." Pursuant to 47 USC 214(e)(6), if a state commission determines that it lacks jurisdiction over a class of carriers, the FCC must determine which carriers in that class may be designated as ETCs. Given these circumstances, it follows that the Commission lacks jurisdiction over CMRS services and the appropriate venue for the designation of ETC status for such services is with the FCC. Accord., Order Granting Petition, ALLTEL Communications, Inc., June 24, 2003.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 28th day of August, 2003.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in cursive script that reads "Patricia Swenson".

Patricia Swenson, Deputy Clerk

pb082503.01

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

April 11, 2003

IN RE:

APPLICATION OF ADVANTAGE CELLULAR
SYSTEMS, INC. TO BE DESIGNATED AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER

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)
)
)

DOCKET NO.
02-01245

ORDER

This matter came before Chairman Sara Kyle, Director Deborah Taylor Tate and Director Pat Miller of the Tennessee Regulatory Authority (the "Authority"), the voting panel assigned in this docket, at the regularly scheduled Authority Conference held on January 27, 2003, for consideration of the *Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier* ("Application") filed on November 21, 2002.

Background

Advantage Cellular Systems, Inc. ("Advantage") is a commercial mobile radio service provider ("CMRS") seeking designation as an Eligible Telecommunications Carrier ("ETC") by the Authority pursuant to 47 U.S.C. §§ 214 and 254. In its *Application*, Advantage asserts that it seeks ETC status for the entire study area of Dekalb Telephone Cooperative, Inc., a rural cooperative telephone company. Advantage maintains that it meets all the necessary requirements for ETC status and therefore is eligible to receive universal service support throughout its service area.

The January 27, 2003 Authority Conference

During the regularly scheduled Authority Conference on January 27, 2003, the panel of Directors assigned to this docket deliberated Advantage's *Application*. Of foremost consideration was the issue of the Authority's jurisdiction. The panel unanimously found that the Authority lacked

jurisdiction over Advantage for ETC designation purposes.¹

This conclusion was implicitly premised on Tenn. Code Ann. § 65-4-104, which provides that:

The Authority has general supervisory and regulatory power, jurisdiction and control over all public utilities and also over their property, property rights, facilities, and franchises, so far as may be necessary for the purpose of carrying out the provisions of this chapter.

For purposes of Tenn. Code Ann. § 65-4-104, the definition of public utilities specifically excludes, with certain exceptions not relevant to this case, “[a]ny individual, partnership, copartnership, association, corporation or joint stock company offering domestic public cellular radio telephone service authorized by the federal communications commission.”

The Authority’s lack of jurisdiction over CMRS providers implicates 47 U.S.C. § 214(e), which addresses the provision of universal service. Where common carriers seeking universal service support are not subject to a state regulatory commission’s jurisdiction, 47 U.S.C. § 214(e)(6) authorizes the Federal Communications Commission (“FCC”) to perform the ETC designation.²

¹ This finding is not inconsistent with the Authority’s decision in *In re: Universal Service Generic Contested Case*, Docket 97-00888, *Interim Order on Phase I of Universal Service*, pp. 53-57 (May 20, 1998), in which the Authority required intrastate telecommunications carriers to contribute to the intrastate Universal Service Fund including telecommunications carriers not subject to authority of the TRA. The decision in Docket No. 97-00888 was based primarily on 47 U.S.C. § 254(f) which authorizes states to adopt regulations not inconsistent with the Federal Communications Commission’s rules on Universal Service and specifically requires every telecommunications carrier that provides intrastate telecommunications services to contribute to the preservation and advancement of universal service in that state. The *Interim Order* was issued prior to the effective date of 47 U.S.C. § 214(e)(6).

² 47 U.S.C. § 214(e)(6) states:

(6) Common carriers not subject to state commission jurisdiction

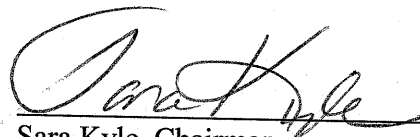
In the case of a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission, the Commission shall upon request designate such a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the Commission consistent with applicable Federal and State law. Upon request and consistent with the public interest, convenience and necessity, the Commission may, with respect to an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated under this paragraph, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the Commission shall find that the designation is in the public interest.

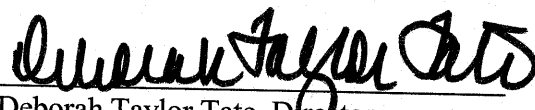
As a matter of "state-federal comity," the FCC requires that carriers seeking ETC designation "first consult with the state commission to give the state commission an opportunity to interpret state law."³ Most carriers that are not subject to a state regulatory commission's jurisdiction seeking ETC designation must provide the FCC "with an affirmative statement from a court of competent jurisdiction or the state commission that it lacks jurisdiction to perform the designation."⁴

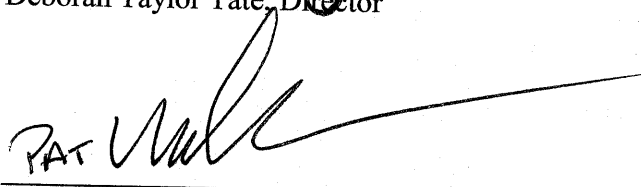
The panel noted that the FCC is the appropriate forum for Advantage to pursue ETC status pursuant to 47 U.S.C. § 214(e)(6). This Order shall serve as the above mentioned affirmative statement required by the FCC.

IT IS THEREFORE ORDERED THAT:

The Application of Advantage Cellular Systems, Inc. To Be Designated As An Eligible Telecommunications Carrier is dismissed for lack of subject matter jurisdiction.


Sara Kyle, Chairman


Deborah Taylor Tate, Director


Pat Miller, Director

³ *In the Matter of Federal-State Joint Bd. on Universal Service*, CC Docket No. 96-45, *Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, 15 F.C.C.R. 12208, 12264, ¶ 113 (June 30, 2000).

⁴ *See id.* (The "affirmative statement of the state commission may consist of any duly authorized letter, comment, or state commission order indicating that it lacks jurisdiction to perform designations over a particular carrier.")

STATE CORPORATION COMMISSION DOCUMENT CONTROL

AT RICHMOND, APRIL 9, 2004

IN RE:

2004 APR -9 A 11:46

APPLICATION OF VIRGINIA CELLULAR LLC

CASE NO. PUC-2001-00263

For designation as an eligible
telecommunications provider under
47 U.S.C. § 214(e) (2)

ORDER INVITING COMMENTS AND/OR REQUESTS FOR HEARING

On December 21, 2001, Virginia Cellular LLC ("Virginia Cellular") filed an application with the State Corporation Commission ("Commission") for designation as an eligible telecommunications carrier ("ETC"). This was the first application by a Commercial Mobile Radio Service ("CMRS") carrier for ETC designation.¹ Pursuant to the Order Requesting Comments, Objections, or Requests for Hearing, issued by the Commission on January 24, 2002, the Virginia Telecommunications Industry Association and NTELOS Telephone Inc. ("NTELOS") filed their respective comments and requests for hearing on February 20, 2002. Virginia Cellular filed Reply Comments on March 6, 2002. Our Order of April 9, 2002, found that § 214(e)(6) of the Act is applicable to Virginia Cellular's application because this Commission has not asserted jurisdiction over CMRS carriers and that Virginia Cellular should apply to the Federal Communications Commission ("FCC") for ETC designation.

Virginia Cellular filed its Petition for Designation as an Eligible Telecommunications Carrier in the State of Virginia with the FCC on April 26, 2002. On January 22, 2004, the FCC released its order designating Virginia Cellular as an ETC in specific portions of its licensed

¹ Virginia Cellular is a CMRS carrier as defined in 47 U.S.C. § 153(27) and is authorized as the "A-band" cellular carrier for the Virginia 6 Rural Service Area, serving the counties of Rockingham, Augusta, Nelson, and Highland and the cities of Harrisonburg, Staunton, and Waynesboro.

service area in the Commonwealth of Virginia subject to certain conditions ("FCC's January 22, 2004, Order").²

The FCC's January 22, 2004, Order further stated that Virginia Cellular's request to redefine the service areas of Shenandoah Telephone Company ("Shentel") and MGW Telephone Company ("MGW") in Virginia pursuant to § 214(3)(5) of the Telecommunications Act of 1996 ("Act") was granted subject to the agreement of this Commission. On March 2, 2004, the FCC filed its January 22, 2004, Order as a petition in this case.³

Section 214(e)(5) of the Act states:

SERVICE AREA DEFINED. - The term "service area" means a geographic area established by a State commission (or the Commission under paragraph (6)) for the purpose of determining universal service obligations and support mechanisms. In the case of an area served by a rural telephone company, "service area" means such company's "study area" unless and until the Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company.

In this instance, the FCC has determined that the service areas of Shentel and MGW, which are both rural telephone companies under the Act, should be redefined as requested by Virginia Cellular.⁴ The FCC further recognizes that the "Virginia Commission's first-hand knowledge of the rural areas in question uniquely qualifies it to determine the redefinition proposal and examine whether it should be approved."⁵

² CC Docket No. 96-45, *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*.

³ See paragraph 45 of the FCC's January 22, 2004, Order. The FCC, in accordance with § 54.207(d) of its rules, requests that the Virginia Commission treat this Order as a petition to redefine a service area under § 54.207(d)(1) of the FCC's rules. A copy of the petition can be obtained from the Commission's website at: <http://www.state.va.us/scc/caseinfo.htm>.

⁴ The FCC denied Virginia Cellular's request to redefine the study area of NTELOS. See paragraph 50 of the FCC's January 22, 2004, Order.

⁵ The FCC's January 24, 2004, Order at paragraph 2. (citations omitted)

The Commission finds that interested parties should be afforded the opportunity to comment and/or request a hearing regarding the FCC's petition to redefine the service areas of Shentel and MGW. We note that the FCC believes that its proposed redefinition of these service areas should not harm either Shentel or MGW.⁶ However, we request any interested party to specifically address in its comments whether our agreeing to the FCC's proposal to redefine the service areas of Shentel and MGW would harm these companies.

NOW UPON CONSIDERATION of all the pleadings of record and the applicable law, the Commission is of the opinion that interested parties should be allowed to comment or request a hearing regarding the FCC's proposed redefinition of Shentel's and MGW's service areas.

Accordingly, IT IS ORDERED THAT:

(1) Any interested party desiring to comment regarding the redefinition of Shentel's and MGW's service areas may do so by directing such comments in writing on or before May 7, 2004, to Joel H. Peck, Clerk of the State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218. Interested parties desiring to submit comments electronically may do so by following the instructions found on the Commission's website: <http://www.state.va.us/scc/caseinfo.htm>.

(2) On or before May 7, 2004, any interested party wishing to request a hearing regarding the redefinition of Shentel's and MGW's service areas shall file an original and fifteen (15) copies of its request for hearing in writing with the Clerk of the Commission at the address set forth above. Written requests for hearing shall refer to Case No. PUC-2001-00263 and shall include: (i) a precise statement of the interest of the filing party; (ii) a statement of the specific action sought to the extent then known; (iii) a statement of the legal basis for such action; and (iv) a precise statement why a hearing should be conducted in the matter.

⁶ See paragraphs 43 and 44 of the FCC's January 22, 2004, Order.

(3) On or before June 1, 2004, interested parties may file with the Clerk of the Commission an original and fifteen (15) copies of any responses to the comments and requests for hearing filed with the Commission. A copy of the response shall be delivered to any person who filed comments or requests for hearing.

(4) This matter is continued generally.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to: each local exchange telephone company licensed to do business in Virginia, as shown on Attachment A hereto; David A. LaFuria, Esquire, Lukas, Nace, Gutierrez & Sachs, Chartered, 1111 19th Street, N.W., Suite 1200, Washington, D.C. 20036; Thomas Buckley, Attorney-Advisor, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, D.C. 20554; Virginia Telecommunications Industry Association, c/o Richard D. Gary, Esquire, Hunton & Williams LLP, Riverfront Plaza, East Tower, 951 East Byrd Street, Richmond, Virginia 23219-4074; L. Ronald Smith, President and General Manager, Shenandoah Telephone Company, P.O. Box 105, Williamsville, Virginia 24487; Lori Warren, Director of Regulatory Affairs, MGW Telephone Company, P.O. Box 459, Edinburg, Virginia 22824-0459; C. Meade Browder, Jr., Senior Assistant Attorney General, Division of Consumer Counsel, Office of Attorney General, 900 East Main Street, 2nd Floor, Richmond, Virginia 23219; and the Commission's Office of General Counsel and Divisions of Communications, Public Utility Accounting, and Economics and Finance.

EXHIBIT 3

FCC-Approved Compliance Plan

Douglas D. Orvis II
douglas.orvis@bingham.com

May 30, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Compliance Plan of Sage Telecom, Inc., WC Docket Nos. 09-197 and 11-42

ATTENTION: Chief, Telecommunications Access Policy Division, Wireline
Competition Bureau

Dear Ms. Dortch:

Sage Telecom, Inc. ("Sage"), through its attorneys, hereby notifies the Wireline Competition Bureau of several internal corporate changes that will affect the provision of Lifeline Service under Sage's Compliance Plan approved December 26, 2012. As part of this change, in the near future, Lifeline services will not be offered by Sage, but by a newly-created affiliated corporation called Sage Telecom Communications, LLC ("Sage, LLC"). Sage respectfully requests the Commission update its records regarding Sage's Compliance Plan and Lifeline services to reflect that such services are now provided by Sage, LLC.

Sage is a competitive local exchange carrier in 26 states and has been designated as an eligible telecommunications carriers ("ETC") in several states. In 2012, pursuant to the rules and procedures adopted in the *Lifeline Reform Order*,¹ Sage submitted a Compliance Plan to obtain a limited ETC designation to provide wireless Lifeline services. Sage's Compliance Plan was approved on December 26, 2012,² and Sage has initiated its Lifeline services for qualified low income consumers in certain service areas.

During the first quarter of 2013, Sage filed the necessary applications with the applicable state public utility commissions to obtain approval for a change in corporate structure.³

¹ *In the Matter of Lifeline and Link Up Reform and Modernization*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (2012) ("*Lifeline Reform Order*").

² *Wireline Competition Bureau Approves the Compliance Plans of Airvoice Wireless, et al.*, Public Notice, DA 12-2063 (rel. Dec. 26, 2013).

³ Commission rules require post-closing notification, which will be filed by Sage in the near future within the required time after the transaction closes.

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Ms. Marlene H. Dortch
May 30, 2013
Page 2

As further detailed in the attached corporate structure chart, the transaction will result in the services provided by Sage, including Lifeline services being provided by Sage, LLC. Certificates to provide telecommunications services are being moved from Sage to Sage, LLC by state commissions. Even though the technical entity has changed, the ultimate parent company remains the same, and the same management and executives remain in charge of policies and procedures. All other information about the company's services and policies as set forth in the Compliance Plan remain accurate. Sage, LLC will offer Lifeline services in accordance with the commitments originally made by Sage in the Compliance Plan.

The transaction will be completely transparent to consumers who will continue to receive the same services, including Lifeline services, under the same terms and conditions as they do now under the "Sage" trade name.

As such, in order to avoid consumer confusion and interruption to Lifeline services provided to low income consumers, Sage respectfully requests that the Bureau revise its records to reflect the Compliance Plan of Sage under the new entity. Ideally, to avoid confusion, the record would list "Sage Telecom Communications, LLC formerly Sage Telecom, Inc." as the entity with an approved Compliance Plan.

Please contact the undersigned with any questions about this matter.

Respectfully Submitted,

/s/

Douglas D. Orvis II
Kimberly A. Lacey

cc: Kim Scardino (via email)



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 12-2063

Release Date: December 26, 2012

WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF AIRVOICE WIRELESS, AMERIMEX COMMUNICATIONS, BLUE JAY WIRELESS, MILLENNIUM 2000, NEXUS COMMUNICATIONS, PLATINUMTEL COMMUNICATIONS, SAGE TELECOM, TELRITE AND TELScape COMMUNICATIONS

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves the compliance plans of nine carriers: AirVoice Wireless, LLC (AirVoice); AmeriMex Communications Corp. (AmeriMex); Blue Jay Wireless, LLC (Blue Jay); Millennium 2000, Inc. (Millennium 2000); Nexus Communications, Inc. (Nexus); PlatinumTel Communications, LLC (PlatinumTel); Sage Telecom, Inc. (Sage); Telrite Corporation (Telrite); and Telscape Communications, Inc. d/b/a Telscape Wireless (Telscape). The compliance plans were filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.¹

The Act provides that in order to be designated as an eligible telecommunications carrier (ETC) for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services”² The Commission amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.³ As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by providing operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.⁴ In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement,

¹ See *Lifeline and Link Up Reform and Modernization et al*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6816-17, paras. 379-380 (2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

² 47 U.S.C. § 214(e)(1)(A).

³ See *Lifeline Reform Order*, 27 FCC Rcd at 6678, para. 47; see also 47 C.F.R. § 54.101(a).

⁴ See *Lifeline Reform Order*, 27 FCC Rcd at 6812, para. 366, App. A; *Connect America Fund et al*, WC Docket 10-90, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*). Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Blanket Forbearance Compliance Plan, WC Docket Nos. 09-197 and 11-42, Q Link Wireless, LLC’s Third Amended Compliance Plan at 4 n. 2 (filed July 30, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under sections 54.101 and 54.401 of the Commission’s rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.⁵ Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁶

The Bureau has reviewed the nine plans listed in the Appendix for compliance with the conditions of the *Lifeline Reform Order* and now approves those nine compliance plans.⁷

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Michelle Schaefer, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

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⁵ See *Lifeline Reform Order*, 27 FCC Rcd at 6813-6817, paras. 368-381.

⁶ See *id.*, 27 FCC Rcd at 6814, 6819, paras. 373, 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

⁷ The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. See *Lifeline Reform Order*, 27 FCC Rcd at 6679-80, 6818-19, paras. 50, 387.

APPENDIX

Petitioner	Compliance Plans As Captioned by Petitioner	Date of Filing	Docket Numbers
AirVoice Wireless, LLC	AirVoice Wireless, LLC's Amended Compliance Plan	December 7, 2012	09-197; 11-42
AmeriMex Communications Corp.	AmeriMex Communications Corp. Revised Compliance Plan	December 6, 2012	09-197; 11-42
Blue Jay Wireless, LLC	Blue Jay Wireless, LLC Compliance Plan	December 19, 2012	09-197; 11-42
Millennium 2000 Inc.	Amended Compliance Plan of Millennium 2000 Inc.	December 18, 2012	09-197; 11-42
Nexus Communications, Inc.	Third Amended Compliance Plan of Nexus Communications, Inc.	December 6, 2012	09-197; 11-42
PlatinumTel Communications, LLC	PlatinumTel Communications LLC's Revised Compliance Plan	December 19, 2012	09-197; 11-42
Sage Telecom, Inc.	Revised Compliance Plan of Sage Telecom, Inc.	December 19, 2012	09-197; 11-42
Telrite Corporation	Telrite Corporation Compliance Plan	December 19, 2012	09-197; 11-42
Telscape Communications Inc. d/b/a Telscape Wireless	Revised Compliance Plan of Telscape Communications, Inc.	December 19, 2012	09-197; 11-42

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Federal-State Joint Board on)	WC Docket No. 09-197
Universal Service)	
)	
Lifeline and Link Up Reform Modernization))	WC Docket No. 11-42
)	
)	

REVISED COMPLIANCE PLAN OF SAGE TELECOM, INC.

Sage Telecom, Inc. (“Sage”), by its attorneys, respectfully submits this Compliance Plan (“Plan”) for the purposes of seeking federal Lifeline support for wireless service under the Universal Service Fund’s Low Income Program.

In the *Lifeline Reform Order*,¹ the Commission adopted rules and procedures through which it instituted “blanket forbearance” from the applications of the facilities requirement to all telecommunications carriers seeking a limited ETC designation to provide wireless Lifeline services. In order to qualify for this blanket forbearance, the Commission requires carriers to comply with certain 911 requirements and file and receive approval of a compliance plan providing specific information about its service offerings and procedures to safeguard against waste, fraud and abuse.

Therefore, Sage respectfully submits this Plan in accordance with the Lifeline Reform Order and instructions set forth in the Wireline Competition Bureau *Public Notice* issued on

¹ *In the Matter of Lifeline and Link Up Reform and Modernization Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-12, ¶ 172 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

February 29, 2012.² Sage seeks approval of this compliance plan only for the provision of Lifeline support to provide wireless services nationwide, as the company offers wireline service as a facilities-based carrier under the approval of state commissions. This Plan sets forth Sage's service offerings and the procedures and measures it will use to safeguard against waste, fraud and abuse. In support of this request, Sage provides the following information:

(1) Information about the carrier and the Lifeline plans it intends to offer:

(a) names and identifiers used by the carrier, its holding company, operating company and all affiliates;

Sage is a Texas corporation with offices located at 10440 N Central Expressway, Suite 700, Dallas, TX 75231.³ The company began operations as a competitive local exchange carrier ("CLEC") providing traditional wireline service in 1998. Sage is authorized as a CLEC in 25 additional states and as an interexchange carrier in Colorado,⁴ and provides service in Arkansas, California, Connecticut, Illinois, Kansas, Michigan, Missouri, Ohio, Oklahoma, Texas and Wisconsin. Sage was authorized as an ETC in Texas in 2002, and Sage also a provider of high speed Internet services. Sage has also been designated as an ETC in a number of other states for the provisions of wireline service Lifeline service and currently has wireline Lifeline customers in five states for which it is reimbursed through state and/or federal programs, depending upon the state and the customer. Specifically, in California, Sage receives support only from the CPUC's Low Income Programs. Sage also receives support from state programs in Kansas, Texas and Wisconsin. Less than 20% of Sage's customers receive a subsidy from a low income

² Public Notice, Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, DA 12-314, (Rel. Feb. 29, 2012).

³ Due to a planned move of corporate offices, this address is effective after October 26, 2012.

⁴ Technically, the services provided by Sage in Texas are under the corporate entity Sage Telecom of Texas, LP, and services in all other states are provided by Sage Telecom, Inc. However, services are all offered to consumers under the trade name "Sage Telecom, Inc."

program. The company is planning to launch wireless service on a non-Lifeline basis, primarily in Texas, through an MVNO arrangement with Sprint. As the company would like to expand this offering to Lifeline customers, Sage seeks approval of a compliance plan to offer Lifeline service using this resold service.

Sage is wholly-owned by TSC Acquisition Corporation (“TSC”). TSC also owns Telscape Communications, Inc., A CLEC based in California that primarily serves customers in that state on both a wireline and wireless basis. Sage, through its common ownership with Telscape, has collective access to a broader market and combined subscriber growth. Sage is also affiliated with TruConnect Mobile, LLC (“TruConnect”), through partial common ownership. TruConnect is 40% owned by TSC, Sage’s parent company as described above. TruConnect provides mobile broadband data services and does not provide any services supported by the low income program.

(b) detailed information demonstrating the carrier is financially and technically capable of providing the supported Lifeline services in compliance with the Commission’s rules;

As a long-time provider of wireline services, particularly in Texas, Sage has a proven record of technical and financial qualifications. The company provides facilities-based wireline service in numerous states and has sophisticated back-office, operational and support systems, which allows it to operate at lower costs and pass those savings on to its subscribers. As a carrier who has provided service for nearly 14 years, Sage possesses the financial viability, as well as the expertise to continue to provide affordable and quality service to customers and has the proven experience to maintain its compliance with all applicable federal and state regulatory guidelines. Sage derives the majority of its revenue from the telecommunications services it provides to its customers. Sage does not and will not rely exclusively on the Universal Service

Fund (“USF”) disbursements to operate, but rather relies on revenues it receives from providing non-Lifeline wireline (and soon wireless) service, the payment for service by Lifeline customers,⁵ as well as high-speed Internet services. In addition, Sage has not been subject to any type of enforcement action or ETC revocation proceeding by the FCC or any state utility regulatory commission.

Sage is working with Sprint Spectrum to resell Sprint’s wireless services to non-Lifeline customers in Texas and elsewhere. As a Lifeline service provider, Sage would continue to work with Sprint, who provides the necessary network infrastructure and wireless facilities necessary for the operation of Sage’s services as a Mobile Virtual Network Operator (“MVNO”). As the Commission is aware, Sprint is a large, nationwide carrier who provides similar service to other wireless Lifeline providers operating as MVNOs. Sage’s agreement and partnership with Sprint further demonstrates its financial and technical capability to provide these services.

(c) detailed information, including geographic locations, of the carrier’s current service offerings if the carrier currently offers service;

As detailed in response to Question 1(a) above, Sage currently provides local and interstate wireline and is planning to provide wireless services in numerous states, with a particular emphasis on Texas.

(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided and additional charges, if any, for toll calls;

At this time, Sage plans to offer the following wireless Lifeline plans and services, subject to state specific requirements or requests from state PUCs. These plans are offered to both Lifeline and non-Lifeline subscribers, with a discount applied to the Lifeline customer. Services will be offered on a prepaid basis, and potentially also on a postpaid basis. All services

⁵ All of Sage’s Lifeline wireline customers currently pay a monthly fee for the discounted service.

will normally have an activation fee and will likely require a monthly payment from the customer. The prices listed below show the basic, non-Lifeline price and the price to the consumer with the \$9.25 Lifeline credit applied. All plans will likely require a monthly payment by the customer. Sage commits to providing a minimum of 250 minutes per month for the \$9.25 subsidy.

Sage is still determining the exact plans it will offer (reiterating the condition that plans will provide a minimum of 250 minutes for the \$9.25 subsidy), but a sample plan would be as follows:

ValuMobile Plus Price: \$24.25 per month/Lifeline Price: \$15.00

Features	Cost
500 minutes Voice/Text	Included
Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
VoiceMail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	\$1.50

Activation Fee: \$25.00

Additional Minutes: For all service plans the customer can purchase additional voice, data, MMS, text minutes for \$0.05 per minute with a minimum purchase of \$5.00. For example, 100 additional minutes will cost \$5.00. The customer will have the ability to purchase 100 minutes (\$5.00); 200 minutes (\$10.00); 300 minutes (\$15.00) and 500 minutes (\$25.00). For Unlimited service plans the customer will not need additional voice or text but will need to purchase additional minutes for data and MMS. MMS is priced at \$0.15 per minute and Data is \$0.05 per MB.

Text Messages: The service plans include text messaging; text messaging rates are assessed at 1 minute per text message sent and 1 minute per text message received.

Other: Plans do not permit rollover minutes. Top Ups are available for a 30 day period as long as the customer renews the service at the normal plan rate. Plans do not allow roaming. The \$25.00 Activation Fee includes selection of a basic handset which is activated and provided ready for use. Customers are allowed to call internationally but will be assessed the international rates. International text rates are \$0.20 per minute for messages sent or received. Special Promotional offer: 10 MB data FREE for 3 months with the selection of a data capable phone.

(e) all other certifications required under newly amended section 54.202 of the Commission's rules.

Section 54.202 requires ETCs to (1) certify that it will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the network unless the ETC is receiving only Lifeline support; (3) demonstrate that it will continue to function in emergency situations including reasonable back-up backup power and emergency traffic management; (4) demonstrate that the carrier will comply with applicable consumer protection and service quality standards; (5) demonstrate that it is financially and technical qualified to provide Lifeline services that comply with the applicable rules; and (6) provide information concerning the terms and conditions of the service plans offered to Lifeline customers.

In response to item (1), Sage certifies that it will comply with applicable service requirements and regulations for Lifeline support.

In response to item (2), Sage is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers.

In response to item (3), as a CLEC provider in multiple states for over 14 years, Sage has significant experience with emergency preparedness. Sage has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies. In addition, Sage's agreement with Sprint provides for the continuation of services during emergencies and sets forth obligations for the service to remain functioning during disasters and similar emergency situations. In addition, as a nationwide carrier and provider of wireless service, Sprint also remains subject to the Commission's authority and must, and does, comply with federal outage reporting requirements.

In response to item (4), Sage certifies that it will comply with the applicable consumer protection and service quality standards. As an operating CLEC in many states, Sage is already subject to states consumer protection and service quality requirements. Sage's wireless Lifeline customers will also receive the same quality service and protections.

Sage's response to items (5) and (6) are provided above and in the provided exhibits

(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all consumer eligibility, consumer enrollment and re-certification procedures as required by Section VI and Appendix C of the Lifeline Reform Order, and a copy of the carrier's certification form;

Under the *Lifeline Reform Order*, ETCs must comply with eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, Sage must also comply with all certification and verification requirements for Lifeline eligibility established by states where Sage is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certifications and annual certifications, Sage certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification.

In states where there is a third party entity acting as the Lifeline administrator (also referred to as the "Low Income Discount Administrator" or "LIDA" in Texas) who is responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the appropriate approval of a potential subscriber's eligibility for Lifeline, Sage will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator.

Based on Sage's history of providing Lifeline and non-Lifeline customers in wireline products, Sage's primary source of signing up Lifeline customers will be via telephone, although some customers may be signed up in person at temporary locations staffed by Sage employees. Visitors to Sage's website will be given information about the program but are required to contact Sage directly via telephone to complete the sign-up process. These callers speak to Sage employees who are specially trained on the Lifeline programs. Sage's customer services representatives will review income- and program-based requirements with applicants via telephone contact. During the initial sign up for service, Sage will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.

Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. The customer would only be given the Lifeline discount when they have satisfied the verification process, either through the state administrator or Sage's internal process. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed.

The Verification process varies by state, in states with a Lifeline administrator, if a new applicant indicates that he or she is eligible for Lifeline service, Sage will provide the applicant's relevant information to the administrator in conformance with any state or Lifeline administrator specific rules. The Lifeline administrator will provide the requisite forms and will be responsible for processing those forms when returned and ensuring the documentation is satisfactory as set forth in state regulations. Sage will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility from the Lifeline administrator.

In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, Sage will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Sections 54.409(a)(1) or

(a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, Sage will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. Sage will inform the applicant that any information provided will be submitted to USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support.

After confirming initial eligibility either in person or over the phone, Sage will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation. Specifically, Sage's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's full name; (ii) the subscriber's full residential street address (P.O. Boxes will not be acceptable); (iii) whether the residential address is permanent or temporary; (iv) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (vii) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, Sage will require all Lifeline applicants to certify, under penalty of perjury, that:

- the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;
- the applicant has provided documentation to Sage that correctly and accurately confirms the subscriber's household income or participation in the above-listed program(s);
- the applicant will notify its carrier within thirty (30) days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify Sage;
- if the applicant moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within thirty (30) days;
- if the applicant provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every ninety (90) days;
- the applicant acknowledges that the subscriber will be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- the applicant's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- the information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per-household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- the applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- the applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not

receive more than one Lifeline benefit and consenting to the inclusion of that information into a Lifeline database.

A sample Sage application is attached hereto as Exhibit A.

This application is mailed by Sage to the customer for completion and is returned to Sage for review and certification. All applications are reviewed by Sage employees. Should Sage engage sales agents to assist in signing up customers, those applications will also be reviewed by Sage employees to ensure the applicant's eligibility.⁶ This review includes a review to determine eligibility as well as a duplicate review process described below. Sage will make itself available as a direct point of contact with all Lifeline applicants. In addition, all Sage employees who have contact with potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If Sage cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, Sage personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then Sage will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income-eligibility or program-based eligibility, Sage will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility.⁷ In addition, if the subscriber provides Sage with a temporary address, it will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Sage within 30 days, the subscriber will be de-enrolled from the Lifeline program.

⁶ In states with a Lifeline Administrator, this process would be handled pursuant to the procedures of the Administrator.

⁷ 47 C.F.R. §§ 54.410(b)(1)(ii)-(iii) and 54.410(c)(1)(ii)-(iii).

Procedures for Annual Re-Certification. Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certifications, Sage will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to Sage that a current subscriber did not re-certify, then Sage will comply with the de-enrollment requirements required by the FCC's rules. Sage will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures.

In states where there is not a Lifeline administrator, Sage will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.410(f)(2) and (f)(5) and 54.405(e)(4). Sage may complete the re-certification process on a rolling basis throughout the year. If Sage cannot determine on-going eligibility by accessing a qualifying database, Sage will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone, by text message, by email or otherwise through the Internet.⁸ Alternatively, beginning in 2013, Sage may elect to have the USAC administer the annual self-certification process.⁹

As part of the re-certification process, Sage will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact Sage for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, Sage will send

⁸ *Lifeline Reform Order*, ¶ 130.

⁹ *Id.*, ¶ 133.

a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.¹⁰

(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access;

The Commission conditioned its grant of forbearance on an ETC (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.¹¹ Sage's wireless service currently complies with these requirements and will continue to comply with these conditions.

Specifically, Sage provides its wireless subscribers with 911/E911 access at the time their service is initiated, regardless of activation status and availability of minutes and provides its subscribers with E911-compliant handsets. It is the company's practice to provide access to 911/E911 to the extent these services are available from the underlying carrier, Sprint. Sage also enables 911 emergency calling from all properly activated handsets regardless of whether the account associated with the handset is active, suspended to terminated. Sage will transmit all 911 calls initiated from any of its handsets even if the associated account has no remaining minutes.

In addition, all phones provided by Sage are 911/E911 compliant. Sage uses phones from Sprint that, based on representations made to Sage by Sprint, have been through the applicable certification process in the company's labs. In the event that a customer does not have an E911-complaint handset, Sage will replace it with a compliant handset at no charge. All new

¹⁰ 47 C.F.R. § 54.405(e)(4).

¹¹ *Lifeline Reform Order*, ¶ 373.

customers who qualify for Lifeline services with Sage will receive a 911/E911-compliant handset free of charge.

(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;

Sage has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline to its customers. With respect to its wireless services, Sage will emphasize in clear, easily understood language: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. Sage will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Sage has and will continue to clearly disclose its name (Sage or Sage Wireless) on all marketing materials. A sample advertisement to be used as a model for creation of state-specific advertisements is attached hereto as Exhibit B. Please note that the two pages of the exhibit represents the front and back of single page document.

(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.

Sage fully understands and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program. Sage derives less than a quarter of its revenue from Low Income service, and does offer a wireline low income service in a number of states both with and without an administrator. Nonetheless, Sage has focused its operations in a

few states, with a goal of focused growth, to be offered initially in Texas, and then into other states in which Sage is already a wireline ETC. This approach has allowed Sage to refine its business practices and to implement policies consistent with the Commission's goal of minimizing waste, fraud and abuse before launching its service nationwide at some time in the future.

Prevention of Duplicates In Sage's Subscriber Base. At time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits the Sage subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, Sage can check it in available databases or provide it to the Lifeline administrator, where applicable, to be checked against addresses for all Lifeline customer addresses for the entire state.

In addition, while it is anticipated that Sage and its affiliate, Telscape will only operate in different states, to the extent that they have Lifeline customers in the same state, customers can be checked against each company's records to further avoid duplication.

Activation and Non-Usage Policy. Sage will not consider a wireless subscriber activated until the customer has chosen a *non-Lifeline* service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this "prequalification guideline" prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer's eligibility has been confirmed through verification or a Lifeline administrator. As such, Sage will not seek reimbursement for any wireless subscriber until the subscriber activates service and

is approved by the Lifeline administrator or by Sage, in states without a third party Lifeline administrator. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive their handset and service until they have an order processed and the activation fee is paid, customers receive activated handsets. Thus, there is no possibility of Sage receiving reimbursement for a customer who does not have an active handset. After the order is processed, Sage personnel activate, configure and test the handsets before they are sent to the consumer. Thus all customers receive an activated handset.

As required by the *Lifeline Reform Order*, Sage has implemented a non-usage policy under which it will de-enroll Lifeline customers that have not used the Sage's Lifeline service for 60 consecutive days. When consumers sign-up for Sage's service, Sage will inform them about the usage requirement. If a Sage Lifeline customer's account does not reflect any usage during any consecutive 60-day period, Sage will deactivate the customer's Lifeline service. Accounts will be deemed active if the Lifeline subscriber: (a) completes an outbound call; (b) purchases minutes or an additional month of service to add to the subscriber's Lifeline service plan; (c) answers an incoming call from a party other than Sage, its agent or representative; or (d) responds to a direct contact from Sage and confirms that he or she wants to continue receiving the Lifeline service.¹²

For Lifeline subscribers failing to use their Lifeline service for a 60-day consecutive period as described above, Sage will provide a clear, easily understood notice that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in

¹² See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

service termination for non-usage. Sage will not terminate service to Lifeline subscribers that use their Lifeline service within 30 days of Sage providing said notice.¹³

Cooperate with Federal and State Regulators and Lifeline Administrators. Sage will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. Sage will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a Sage Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability Database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service; and
- Comply with federal and state audit requirements.

¹³ 47 C.F.R. § 54.405(e)(3).

CONCLUSION

Sage respectfully submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*. Accordingly, Sage respectfully requests approval of this Compliance Plan so that Sage can provide essential Lifeline wireless service to eligible low-income customers nationwide.

Respectfully submitted,

/s/ electronically signed

Douglas D. Orvis II
Kimberly A. Lacey
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006

Date: December 19, 2012

Exhibits

EXHIBIT A
CERTIFICATION FORMS



FEDERAL LIFELINE CERTIFICATION FORM

Lifeline Information

- Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers.
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

Lifeline Certification Instructions

Step 1. Fill out the Customer Information Section. You must provide the last four digits of your Social Security Number and Date of Birth.

Step 2. Indicate How You Qualify for Lifeline. Choose whether you participate in a qualifying program or if you household income falls within the guidelines. You MUST send photocopies demonstrating that you participate in the qualifying program or if you qualify based on your household income, you must provide documentation of income that covers one full year. Documentation that does not cover a full year, such as paystubs, the customer must present the same type of documentation covering Three Consecutive Months within the previous twelve months.

Step 3. Determine If You Qualify for Tribal Land. Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lands a customer must reside on Tribal Lands and participate in one of the following programs: Tribally Administered Free School Lunch Program, Tribally Administered Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, Head Start (those meeting income standard), and Bureau of Indian Affairs General Assistance.

Step 4. Certify Customer Eligibility. Each customer must certify, under penalty of perjury, for receiving Lifeline support, by initialing ALL areas under this section.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Step 6. Supporting Documentation. Don't forget that you must include supporting documentation which can include a copy of an award letter or card in the qualifying program based. Income documentation could include the prior year's state or federal tax return, paycheck stubs for the most recent 3 months, social security statement of benefits, child support document, retirement/pension statement of benefits, unemployment/workmen's compensation statement of benefits, Federal notice letter of participation in General Assistance, and other official document.

Step 7. Send the Certification Form. When completed, you may mail the form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228



FEDERAL LIFELINE CERTIFICATION FORM

Step 1. Customer Information Section

Name of Applicant: _____ Telephone Number: _____

Account Number: _____ Date of Birth: _____

Applicant's Service Address (May NOT be a P.O. BOX): _____

☐ Please check this box if the above is a Temporary Address. Last Four Digits of SSN: _____

City: _____ State: _____ Zip: _____

Billing Address (if different from Service Address): _____

Step 2. Determine How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household who is receiving the benefits: _____.

(#1). I qualify for Lifeline under **Program-Based Criteria** because I participate in the following program.

Check only **ONE** box below:

- | | |
|---|---|
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Supplemental Security Income (SSI) |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> National School Lunch Program (Free Lunch Program) | <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | |

(#2). I qualify for Lifeline under the **Income-Based Criteria** because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is: _____ (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

Step 3. Determine If You Qualify for Tribal Lands (If Applicable, Choose either #1 or #2)

My Tribal ID Number: _____ Check **ONE** box below:

(#1) ☐ I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I participate in the following tribally administered program.

- | | |
|---|---|
| <input type="checkbox"/> Tribally Administered Free School Lunch Program | <input type="checkbox"/> Tribally Administered Temporary Assistance for Need Families |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Head Start (those meeting income standard) |
| <input type="checkbox"/> Bureau of Indian Affairs General Assistance | |

Step 4. **CERTIFY APPLICANT'S ELIGIBILITY**

Please **Check** or **Initial All** the statements below to certify your eligibility.

I certify, under penalty of perjury, that:

- ____: I meet the income-based or program-based eligibility criteria.
- ____: I **must** notify Sage within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline support, I am receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.
- ____: When I move to a **new address**, I **must** provide that my new address to Sage within 30 days.
- ____: I acknowledge that a household is eligible to receive only **one** Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.
- ____: The information contained in this Lifeline certification form is true and correct to the best of my knowledge.
- ____: I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline benefits, is punishable by law.
- ____: I acknowledge that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify as to my continued eligibility will result in the de-enrollment and termination of my Lifeline benefits pursuant to the Code of Federal Regulation Section 54.405(e)(4).
- ____: I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.
- ____: If I provided a temporary address, I will be required to verify my temporary address every 90 days.
- ____: I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give consent to Sage to verify with the National Lifeline Accountability Database my eligibility in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Signature

Printed Name

Date

You may mail the completed Lifeline form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

For Sage Telecom, Inc.'s Use Only!

Lifeline Certification Approval / Denial _____ Service Order Provisioned By _____ Date _____

Supporting Documentation Provided _____



FEDERAL LIFELINE RECERTIFICATION FORM

Lifeline Information

- All Lifeline subscribers must annually recertify their continued eligibility in the Lifeline program.
- Lifeline is a Federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers (wireline or wireless).
- You must use your phone every 60 days to maintain service. Usage includes making an outbound call, answering an incoming call. Usage can also include the purchase of additional minutes or payment of your monthly bill. If there is no usage on your account for 60 days you will be de-enrolled from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- Failure to recertify will result in being de-enrolled from the program and loss of the Lifeline credits.

Instructions for Completing the Attached Lifeline Recertification Form

Step 1. Fill out the Customer Information Section. You must provide the last four digits of your Social Security Number and date of birth.

Step 2. Indicate How You Continue to Qualify for Lifeline. Choose whether you continue to participate in a qualifying program or if your annual household income remains at or below the income guidelines. Please choose **Program-Based or Income-Based eligibility**, but not both.

Step 3. Determine If You Continue to Qualify for Tribal Lifeline. (If Applicable) Not all customers will be eligible for the Tribal Land benefit. To be eligible for Tribal Lifeline service, the applicant must reside on Federally recognized Tribal Land.

Step 4. Certify Customer Eligibility. Each applicant must certify, under penalty of perjury, to receive Lifeline service, by initialing or checking ALL items under this section.

Step 5. Sign Certification Form. You must print your name and sign the certification form indicating that you are complying with the Lifeline rules.

Step 6. Send in the Certification Form. Upon completion, please mail the completed form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

All steps are required except Step 3 above for processing of your recertification form.

Please send the completed Lifeline Recertification Form to Sage within **30** days upon receipt.



FEDERAL LIFELINE RECERTIFICATION FORM

Step 1. Customer Information Section

Name of Applicant: _____ Telephone Number: _____

Account Number: _____ Date of Birth: _____

Applicant's Service Address (May NOT be a P.O. BOX): _____

☐ Please check this box if the above address is a temporary address. Last Four Digits of SSN: _____

City: _____ State: _____ Zip: _____

Billing Address (if different from Service Address): _____

Step 2. Indicate How You Qualify For Lifeline (Choose either #1 or #2)

If the person who receives the benefit is not the Sage account holder, then please provide the name of the person in your household receiving the benefits: _____.

(#1). I qualify for Lifeline under the **Program-Based Criteria** because I participate in the following program(s):

Check only **ONE** box below:

- | | |
|---|---|
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |
| <input type="checkbox"/> Low Income Heat Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> National School Lunch Program (Free Lunch Program) | |

(#2). I qualify for Lifeline under the **Income-Based Criteria** because my annual household income is at or below 135% of the federal poverty level guidelines. The number of individuals in my residential household is: _____ (Number in household)

Annual Income 135% of Federal Poverty Level Thresholds Based on Household Size					
1	2	3	4	5	For each additional person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	+\$5,346 per person

Step 3. Determine If You Qualify for Tribal Lifeline (If Applicable, Choose either #1 or #2)

My Tribal ID Number is: _____ Check **ONE** box below:

(#1) ☐ I qualify for Tribal Lifeline service as an eligible resident on federally recognized tribal land.

(#2) I qualify for Tribal Lifeline service as I participate in the following tribally administered program.

- | | |
|---|--|
| <input type="checkbox"/> Tribally Admin Free School Lunch Program | <input type="checkbox"/> Tribally administered Temporary Assistance for Needy Families |
| <input type="checkbox"/> Head Start (those meeting income standards) | <input type="checkbox"/> Bureau of Indian Affairs General Assistance |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) | |

Step 4. CERTIFY APPLICANT'S ELIGIBILITY

Please Check or Initial All the statements below to certify your continued eligibility.

I certify, under penalty of perjury, that:

____: I continue to meet either the income-based or program-based eligibility criteria.

____: I must notify Sage within 30 days if, for any reason, I no longer satisfy the criteria for receiving Lifeline including, as applicable, if I no longer meet the income-based or program-based criteria, I am receiving more than one Lifeline service, or another member of my household is receiving a Lifeline service. I understand this requirement to notify Sage if my eligibility changes and that I may be subject to penalties if I fail to follow this notification requirement.

____: When I move to a new address, I must provide my new address to Sage within 30 days.

____: I know that my household is eligible to receive only one Lifeline service and, to the best of my knowledge, no other member in my household is currently receiving wireline or wireless Lifeline service.

____: The information contained in this Lifeline certification form is true and correct to the best of my knowledge.

____: I acknowledge that providing false or fraudulent information on this certification form, to receive Lifeline service, is punishable by law.

____: I understand that I may be required to recertify my eligibility for Lifeline at any time, and failure to recertify my continued eligibility will result in the de-enrollment and termination of my Lifeline service, pursuant to the Code of Federal Regulation 47 Section 54.405(e)(4).

____: I understand that if violation of the one-per-household rule constitutes a violation of FCC rules and will result in my de-enrollment from the Lifeline program.

____: If I provided temporary address, I will be required to verify my temporary address every 90 days.

____: I authorize Sage to release information concerning my service necessary to administer the Lifeline program (such as name, address, telephone number) to the Universal Service Administrative Company. I give my consent for Sage to verify with the National Lifeline Accountability Database whether I participate in certain low-income assistance programs or verify my income to qualify me for Lifeline service. Sage shall maintain the information in this form and any information received about me from the National Lifeline Accountability Database as confidential customer account information. Failure to provide consent will result in being denied the Lifeline service.

Step 5. Sign Certification Form.

You must print your name and sign the certification form indicating you are complying with the Lifeline rules.

Signature

Printed Name

Date

You may mail the completed Lifeline form to:

Sage Telecom, Inc.
10440 N Central Expressway
Suite 700
Dallas, TX 75231-2228

For Sage Telecom, Inc.'s Use Only!

Lifeline Recertification Approval / Denial _____ Service Order Provisioned By _____ Date _____

Lifeline Participating Program / Income Based Criteria _____

EXHIBIT B

SAMPLE MARKETING

MAKE THE RIGHT CALL SWITCH TO SAGE TELECOM

✓ **No Contract**
✓ **No Credit Check**

- **500 ANYTIME MINUTES FOR ONLY \$15.00 PER MONTH***
- **GET AN AFFORDABLE MOBILE PHONE**

PLUS THIS BONUS:

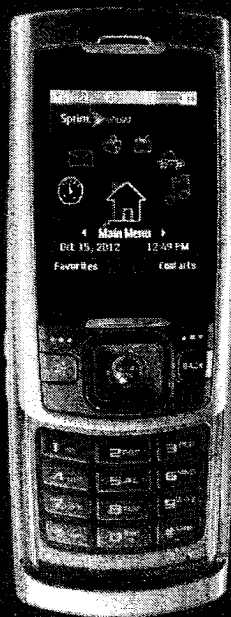
SIGN UP FOR WIRELESS LIFELINE SERVICE AND GET AN ADDITIONAL 100 MINUTES FREE!

CALL TODAY
866-674-6729

SEE DETAILS ON BACK ►

WE'VE GOT A PLAN FOR YOU CALL TODAY 866-674-6729

We make it affordable for you to get low-cost talk and text through a government assistance program called Lifeline. Now you can keep in touch with your family and friends. Qualified customers simply prepay \$15.00 per month and get 500 anytime talk and text.



YOU GET A GREAT DEAL MORE INCLUDING:

- **FREE Call Waiting**
- **FREE Caller ID**
- **FREE Voice Mail**
- **Nationwide Service**

Don't wait. Call today 866-674-6729 to see if you qualify for Wireless Lifeline Service. Sage Telecom Sales Reps are available to take your call.

HOW TO GET THE DEAL

To qualify for amazing Wireless Lifeline Service, all you have to do is participate in one of the following:

- Medicaid
- Federal Public Housing Assistance (Section 8)
- Health Benefit Coverage under the Children's Health Insurance Plan (CHIP)
- Low Income Housing Energy Assistance (LIHEAP)
- Food Stamps or Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)
- Tribal TANF
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)
- Food Distribution Program on Indian Reservations (FDPIR)

You may also qualify if your total household income is at or below the Federal Poverty Guideline.

*Lifeline is a government assistance program, the service, is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. Any person who knowingly makes false statements in order to obtain Lifeline service will be subject to fines or imprisonment or can be barred from the program. 500 minutes can be for either talk or text. Monthly standard rate of \$24.25 will apply until you are certified. Discounted monthly rate of \$15.00 will start upon approval of Federal Lifeline. Payment plans are available for the \$25.00 activation fee that includes selection of a basic mobile phone which is activated and provided ready for use. Mobile phone may be data enabled.

EXHIBIT 4

Sample Advertisement



**Free Lifeline
Phone Service**

Lifeline Phone Service

INCLUDED WITH FREE LIFELINE SERVICE

750 Minutes

Unlimited Text

1 GB of Data

Unlimited Int'l Talk
to Mexico, China, & Canada

All Plans Include: Voicemail, Caller ID, 3-Way Calling.
Unlimited Text to 80+ countries, and up to 3G speeds.

Sign Up Today!



Visit us at
www.truconnect.com



Call us at
800.430.0443

Follow us for Updates & Specials!



@TruConnect



@TruConnect



@TruConnect_LA

Lifeline Plus

If you qualify for the Lifeline Program, you can receive a
\$10 discount on any Pay As You Go Monthly Plans

MONTHLY

\$25/mo

TALK & TEXT

Unlimited

DATA

3 GB

INT'L TALK

Unlimited
Mexico China, & Canada

\$35/mo

Unlimited

5 GB

Unlimited
Mexico China, & Canada

Add-Ons

INTERNATIONAL MONTHLY PLANS

\$5/mo.

Unlimited Talk
to 55+ countries

ADD MORE DATA ANYTIME

\$5

500 MB

\$10

1 GB

Unlimited calling to the first ten unique
numbers each month. Expires in 30 days.

Data Refills expire after 30 days.

INTERNATIONAL REFILL

INTERNATIONAL RATES

Add more Int'l minutes anytime for just **\$5**.

International Refills will expire in 30 days & are
charged per minute

International Service

Int'l calls are charged at the applicable rate
plus airtime. Advertised int'l rates do not apply
to calls made to foreign mobile phones unless
specified or to off network/special locations
and in some instances may be higher.

A full list of rates can be found at
www.truconnect.com/international and are
subject to change. The provider for TruConnect
international calls is Elite Telecom. For full
terms and conditions, go to: www.truconnect.com/legal-terms-and-conditions-personal/.



Free Lifeline Phone Service

TruConnect Exclusives

wefi connect

WHAT IS THE WEFI APP?

Everyone loves a good Wi-Fi connection these days. It's free and saves you from using loads of data each month.

But it's never simple — which connection is the fastest? Which is the safest?

That's where we come in.

The Wefi app will automatically locate and instantly connect to the strongest Wi-Fi network available.

All of the 200+ million Wi-Fi hotspots in our database were discovered by someone like you — join our network and help us connect the world.



Everything you love about your wireless plan is now available in one easy-to-use app.

- Unlimited texts in the U.S. and Canada
- FREE global texts to any TruText, Textplus, or Nextplus user
- Unlimited Wi-Fi calling
- Send your friends fun gifs and stickers
- A unique phone number for the area code of your choice
- Earn free calling credits by watching videos



Lifeline Program

What is the Lifeline Program?
This is a Lifeline service brought to you by TruConnect. Lifeline is a government assistance program. The service is non-transferable and only eligible consumers may enroll. Only one Lifeline service is allowed per household. TruConnect provides free Unlimited Text, 500 minutes + 500MB of data to qualified low-income customers. If you qualify, you will also have unlimited access to 911 and customer service. To keep your service active, you must use it at least once every 30 days.

How Do I Qualify?

You may qualify for the Lifeline program if you, a dependent, or your household is enrolled in certain government programs or if your household income is at or below certain income limits. Apply in person with an Authorized Dealer, online, or by calling customer service. All of TruConnect's Lifeline Plans have the following features:

- Free customer service calls
- Free voicemail, caller ID, and call waiting
- Free 911 and balance inquiry calls

Documents Required to Apply

- Government-Issued Picture ID (Full name, DOB, not expired)
- Proof of Eligibility (Program card, participation letter, or income proof)
- Proof of Address (May be required)
- Social Security Number (Last 4 digits)

For Additional Information Contact
TruConnect Customer Service:
611 or visit www.truconnect.com/lifeline

Lifeline Program:
866.272.0357 or visit www.lifelinesupport.org

Lifeline Eligibility

Method 1 Program-Based Eligibility
You may qualify for the Lifeline discount if you OR another member of your household is currently enrolled in any one of the following public assistance programs:

- Supplemental Nutrition Assistance Program (SNAP/Food Stamps/Food Assistance)
- Medicaid (not Medicare)
- Supplemental Security Income (SSI)*
- Federal Public Housing Assistance (FPHA)
- Veterans Pension or Survivors Pension Benefit

*Social Security benefits and/or Social Security Disability benefits are not program-based eligibility qualifiers. Social Security and/or Social Security Disability income may only be used to qualify for Lifeline Program participation under the income-based eligibility method.

Household Size	Annual Income Limits
1	\$16,281
2	\$21,924
3	\$27,567
4	\$33,210
5	\$38,853
6	\$44,496
7	\$50,139
8	\$55,782
Additional Member	Add \$5,643

(Effective 1/1/17-12/31/17)

Lifeline Service

Monthly Plans & Data Refills
Monthly Plans expire after 30 days. If you add a Monthly Plan before your current Monthly Plan expires, your new Monthly Plan will replace your current Monthly Plan.

The data from your Monthly Plan expires after 30 days. A Data Refill is separate from the data included in your Monthly Plan, and your refill will be used after the data in your Monthly Plan. Data Refills cannot be used unless you are on a current Monthly Plan.

Lifeline Service

Comprehensive terms and conditions for the TruConnect Lifeline Plans are available at www.truconnect.com. All terms and conditions of service as described herein apply to services provided under the Lifeline Plans. Lifeline is a government assistance program, and Lifeline service is non-transferable. Only eligible consumers may enroll, and the program is limited to one discount per household. You acknowledge and agree that TruConnect may modify or terminate its Lifeline services in the event that there are any changes to the applicable governmental programs and subsidies, upon prior notice to you if/as required by state and federal regulations. The Lifeline Administrator will determine whether or not you are eligible for Lifeline. Proof of eligibility is required such as an eligible program card or statement of benefits. TruConnect will notify you when your Lifeline application has been approved. You understand that by signing up for a Lifeline Plan with TruConnect, you may not have a Lifeline plan with any other carrier (wireless or landline), and you further agree to comply with any documentation or verification procedure necessary to confirm that you qualify for the Lifeline Program. If you are no longer eligible for Lifeline, TruConnect may terminate your account. If you misrepresent your eligibility for Lifeline, you agree to pay us the additional amount you would have been charged under the most favorable rate plan for which you are eligible. To remain qualified for Lifeline, you must successfully complete an annual renewal form. If you fail to complete the annual renewal by the required date, you will be de-enrolled from the TruConnect Lifeline services. Your TruConnect Lifeline service handset is non-transferable. You agree not to give away, resell, or offer to resell your Lifeline service. Removing the handset from the home may prevent other household members from making and receiving calls. Coverage limitations, including service interruptions due to terrain, signal strength, and weather, may affect the ability to make or receive calls, including calls to 911 in the event of an emergency. In the event that you breach these Terms & Conditions, TruConnect reserves the right to immediately de-enroll you from the TruConnect Lifeline services.

EXHIBIT 5

Coverage Area

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ABVLALXA	Alabama	BRPTALMA	Alabama	FLRKALXA	Alabama
AHVLALXA	Alabama	BRTOALMA	Alabama	FLRLALXA	Alabama
ALBRALXA	Alabama	BRYNALXA	Alabama	FLRNALMA	Alabama
ALBSALMA	Alabama	BSMRALBP	Alabama	FLVLALXA	Alabama
ALCYALMT	Alabama	BSMRALBU	Alabama	FOLYALXA	Alabama
ALVLALMA	Alabama	BSMRALHT	Alabama	FOLYALXB	Alabama
ANTNALLE	Alabama	BSMRALMA	Alabama	FRDNALXA	Alabama
ANTNALMT	Alabama	BYMNALMA	Alabama	FRHMALXA	Alabama
ANTNALOX	Alabama	CALRALMA	Alabama	FRHPALMA	Alabama
ARABALXA	Alabama	CHBGALMA	Alabama	FTDPALMA	Alabama
ARITALXA	Alabama	CHLFALXA	Alabama	FTMRALXA	Alabama
ARMRALXA	Alabama	CHLSALMA	Alabama	FTMRALXB	Alabama
ARNYALXA	Alabama	CLANALMA	Alabama	FTPYALMA	Alabama
ASFRALXA	Alabama	CLMBALMA	Alabama	FWRVALXA	Alabama
ASLDALXA	Alabama	CLMNALJC	Alabama	FYFFALXA	Alabama
ATHNALER	Alabama	CLMNALMA	Alabama	FYTTALXA	Alabama
ATHNALMA	Alabama	CMPHALXA	Alabama	GDBAALXA	Alabama
ATMRALXA	Alabama	CNTMFLLE	Alabama	GDSDALHS	Alabama
ATTLALNM	Alabama	COVLALXA	Alabama	GDSDALMT	Alabama
AUBNALMA	Alabama	CRDVALMA	Alabama	GDSDALRD	Alabama
BLBTALXA	Alabama	CRHLALNM	Alabama	GDWRALMA	Alabama
BLFNALMA	Alabama	CRLDALMA	Alabama	GLDNALXA	Alabama
BNKSALXA	Alabama	CRTNALXA	Alabama	GLSHALXA	Alabama
BNSCALXA	Alabama	CSTLALXA	Alabama	GLSHALXB	Alabama
BOAZALMA	Alabama	CSVLALXA	Alabama	GNBOALMA	Alabama
BRHMALCH	Alabama	DCTRALMT	Alabama	GNVLALXA	Alabama
BRHMALCP	Alabama	DDVLALMA	Alabama	GORDALXA	Alabama
BRHMALEL	Alabama	DELTALXA	Alabama	GOVLALXA	Alabama
BRHMALEN	Alabama	DLVLALXA	Alabama	GRDLALNM	Alabama
BRHMALEW	Alabama	DMPLALMA	Alabama	GRGNALXA	Alabama
BRHMALFO	Alabama	DORAALMA	Alabama	GRLYALMA	Alabama
BRHMALFS	Alabama	DPISALXA	Alabama	GSHNALXA	Alabama
BRHMALHW	Alabama	DTHNALXA	Alabama	GTVLALNM	Alabama
BRHMALMT	Alabama	ECHOALXA	Alabama	GUINALXA	Alabama
BRHMALOM	Alabama	ELBTALXA	Alabama	GYVLALNM	Alabama
BRHMALOX	Alabama	ELBTALXB	Alabama	HDLDALXA	Alabama
BRHMALRC	Alabama	ELMTALXA	Alabama	HFLNALXA	Alabama
BRHMALTA	Alabama	ENTRALXA	Alabama	HGLYALXA	Alabama
BRHMALVA	Alabama	ETVLALXA	Alabama	HLVIALMA	Alabama
BRHMALWE	Alabama	EUFLALMA	Alabama	HLVLALXA	Alabama
BRHMALWL	Alabama	EUTWALBO	Alabama	HMTNALXA	Alabama
BRILALXA	Alabama	EUTWALMA	Alabama	HNGRALXA	Alabama
BRNDALXA	Alabama	EVRGALMA	Alabama	HNVIALLW	Alabama

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
HNVIALMT	Alabama	MOBLALAP	Alabama	PLCYALXA	Alabama
HNVIALPW	Alabama	MOBLALAZ	Alabama	PNSNALMA	Alabama
HNVIALRW	Alabama	MOBLALBF	Alabama	PRSHALNM	Alabama
HNVIALUN	Alabama	MOBLALOS	Alabama	PRVLALMA	Alabama
HNVLALBR	Alabama	MOBLALPR	Alabama	RAMRALXA	Alabama
HNVLALNM	Alabama	MOBLALSA	Alabama	RBDLALXA	Alabama
HRTSALNM	Alabama	MOBLALSE	Alabama	RBDLALXB	Alabama
HRTSALPE	Alabama	MOBLALSF	Alabama	RCFRALXA	Alabama
HXFRALXA	Alabama	MOBLALSH	Alabama	RFRMALXA	Alabama
HYVLALXA	Alabama	MOBLALSK	Alabama	RGLDALXA	Alabama
HZGRALMA	Alabama	MOBLALTH	Alabama	RLVLALMA	Alabama
IRSEALXA	Alabama	MOLTALNM	Alabama	RNVLALXA	Alabama
JCVLALMA	Alabama	MRCYALXA	Alabama	RPTNALXA	Alabama
JMSNALXA	Alabama	MRLWALXA	Alabama	RRVLALMA	Alabama
JSPRALMT	Alabama	MSSYALXA	Alabama	SELMALMT	Alabama
KLLNALMA	Alabama	MTGMALDA	Alabama	SHFDALMT	Alabama
LECTALXA	Alabama	MTGMALMB	Alabama	SHWMALXA	Alabama
LEDSALXA	Alabama	MTGMALMT	Alabama	SLCMALXA	Alabama
LEDSALXB	Alabama	MTGMALNO	Alabama	SLGNALXA	Alabama
LGTNALMA	Alabama	MTVRALMA	Alabama	SMNLALXA	Alabama
LLNALXA	Alabama	NAUVALXA	Alabama	SMNLALXB	Alabama
LLNALXB	Alabama	NCTRALXA	Alabama	SNEDALXA	Alabama
LNCLALXA	Alabama	NTSLALXA	Alabama	SNRCALXA	Alabama
LNDLALXA	Alabama	NWBCALXA	Alabama	SPVLALXA	Alabama
LNDNALMA	Alabama	NWHPALXA	Alabama	SRDLALXA	Alabama
LSBGALXA	Alabama	NWMRALXA	Alabama	SYLCALMT	Alabama
LVTNALLA	Alabama	NWTNALXA	Alabama	THMTALXA	Alabama
LWBOALXA	Alabama	NWVIALXA	Alabama	THRSALXA	Alabama
LXLYALXA	Alabama	ODRGALXA	Alabama	TLDGALMA	Alabama
LXLYALXB	Alabama	ODVLALXA	Alabama	TLDGALRF	Alabama
LXTNALMA	Alabama	OHTCALMA	Alabama	TLLSALXA	Alabama
LYNNALXA	Alabama	ONNTALXA	Alabama	TROYALMA	Alabama
MARNALNM	Alabama	OPLKALMT	Alabama	TSCLALDH	Alabama
MCCLALXA	Alabama	ORBHALXA	Alabama	TSCLALMT	Alabama
MCKNALXA	Alabama	ORBHALXC	Alabama	TSCLALNO	Alabama
MDSNALNM	Alabama	ORBHALXD	Alabama	TSKGALMA	Alabama
MENTALXA	Alabama	ORVLALXA	Alabama	TSVLALXA	Alabama
MGSPALXA	Alabama	OZRKALXA	Alabama	TWCKALMA	Alabama
MLCYALXA	Alabama	PANLALXA	Alabama	UNSPALXA	Alabama
MLPTALXA	Alabama	PDMTALMA	Alabama	UNTWALNM	Alabama
MNFDALMA	Alabama	PHBLALXA	Alabama	URIHALXA	Alabama
MNTVALNM	Alabama	PHCYALFM	Alabama	VNCNALMA	Alabama
MNVLALXA	Alabama	PHCYALMA	Alabama	VYHDALXA	Alabama

<u>WC Code</u>	<u>State</u>
WBTNALNM	Alabama
WCBGALXA	Alabama
WLGVALXA	Alabama
WNFDALXA	Alabama
WRRRALNM	Alabama
WTMPALMA	Alabama
YORKALMA	Alabama

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
BLFDCT00	Connecticut	HNTNCT00	Connecticut	PTNMCT00	Connecticut
BLTCCT00	Connecticut	HRFRCT03	Connecticut	RDFDCT00	Connecticut
BRFDCT00	Connecticut	JWCYCT00	Connecticut	RDNGCT00	Connecticut
BRFRCT00	Connecticut	KENTCT00	Connecticut	RKVLCT00	Connecticut
BRLNCT00	Connecticut	LBNNCT00	Connecticut	SFFDCT00	Connecticut
BRPTCT01	Connecticut	LDYRCT00	Connecticut	SGTNCT00	Connecticut
BRPTCT03	Connecticut	LKVLCT00	Connecticut	SHRNCT00	Connecticut
BRSTCT00	Connecticut	LTFDCT00	Connecticut	SMBYCT00	Connecticut
BTHNCT00	Connecticut	LYMECT01	Connecticut	SMFRCT01	Connecticut
CHSHCT01	Connecticut	MDLBCT00	Connecticut	SMFRCT02	Connecticut
CLCHCT00	Connecticut	MDSNCT01	Connecticut	SOBYCT00	Connecticut
CLMACT00	Connecticut	MDSNCT02	Connecticut	SRFRCT00	Connecticut
CLTNCT00	Connecticut	MDTWCT00	Connecticut	STRSCT01	Connecticut
CNANCT00	Connecticut	MLFRCT00	Connecticut	STSPCT00	Connecticut
CNTNCT00	Connecticut	MNCHCT00	Connecticut	STTNCT00	Connecticut
CNTYCT00	Connecticut	MODSCT00	Connecticut	SYMRCT00	Connecticut
CRNWCT00	Connecticut	MRDNCT00	Connecticut	THSNCT00	Connecticut
CRWLCT00	Connecticut	MRLBCT00	Connecticut	THTNCT00	Connecticut
DARNCT00	Connecticut	MTVLCT00	Connecticut	TMBLCT00	Connecticut
DNBRCT00	Connecticut	MYSTCT00	Connecticut	TRTNCT00	Connecticut
DNSNCT00	Connecticut	NBFRCT00	Connecticut	UNVLCT00	Connecticut
DPRVCT00	Connecticut	NGTCCT00	Connecticut	WASHCT00	Connecticut
DRBYCT00	Connecticut	NHVNCT00	Connecticut	WDSTCT00	Connecticut
DRHMCT00	Connecticut	NINTCT00	Connecticut	WHFRCT01	Connecticut
EHRTCT01	Connecticut	NMFRCT00	Connecticut	WHFRCT02	Connecticut
EHRTCT02	Connecticut	NRFLCT00	Connecticut	WLCTCT00	Connecticut
EHTNCT00	Connecticut	NRWCCT00	Connecticut	WLFRCCT00	Connecticut
EHVNCT00	Connecticut	NRWLCT02	Connecticut	WLKSCT00	Connecticut
ENFDCT01	Connecticut	NRWLCT03	Connecticut	WLMNCT00	Connecticut
ENFDCT02	Connecticut	NWBRCT00	Connecticut	WLTOCT00	Connecticut
ESSXCT00	Connecticut	NWCNCT00	Connecticut	WNSDCT00	Connecticut
FRFDCT00	Connecticut	NWFLCT00	Connecticut	WNSTCT00	Connecticut
FRTNCT00	Connecticut	NWHNCT03	Connecticut	WPNGCT00	Connecticut
GLBYCT00	Connecticut	NWLNCT02	Connecticut	WSBKCT00	Connecticut
GNWCCTGN	Connecticut	NWNTCT00	Connecticut	WSHNCT00	Connecticut
GRNBCT00	Connecticut	NWTWCT00	Connecticut	WSPTCT00	Connecticut
GRTNCT00	Connecticut	OGNWCT00	Connecticut	WSTVCT00	Connecticut
GRTWCT00	Connecticut	OLSYCT00	Connecticut	WTFDCT00	Connecticut
GSHNCT00	Connecticut	ORNGCT00	Connecticut	WTRBCT00	Connecticut
GUFDCCT00	Connecticut	PLFDCT00	Connecticut	WTTWCT00	Connecticut
HGNMCT00	Connecticut	PLVLCT00	Connecticut		
HMDNCT00	Connecticut	PRSPCT00	Connecticut		
HMPNCT00	Connecticut	PTLDCT00	Connecticut		

<u>WC Code</u>	<u>State</u>
WASHDCAC	D.C.
WASHDCBK	D.C.
WASHDCBN	D.C.
WASHDCCH	D.C.
WASHDCDN	D.C.
WASHDCDP	D.C.
WASHDCGG	D.C.
WASHDCGT	D.C.
WASHDCLC	D.C.
WASHDCMO	D.C.
WASHDCMT	D.C.
WASHDCSE	D.C.
WASHDCSW	D.C.
WASHDCWL	D.C.

<u>WC Code</u>	<u>State</u>
ANGLDEAN	Delaware
BGVLDEBG	Delaware
CMDNDECD	Delaware
DGBODEDG	Delaware
DLMRDEDM	Delaware
DOVRDEDV	Delaware
FETNDEFE	Delaware
FRDRDEFR	Delaware
GMBODEGB	Delaware
GNWDDEGN	Delaware
GRTWDEGR	Delaware
HCKSDEHC	Delaware
HLOKDEHL	Delaware
HRTLDEHL	Delaware
HRTNDEHA	Delaware
LARLDELRL	Delaware
LEWSDELW	Delaware
MDTWDEMT	Delaware
MLBODEMB	Delaware
MLFRDEMF	Delaware
MLTNDEML	Delaware
MSTNDEMA	Delaware
NWCSDENC	Delaware
NWRKDENB	Delaware
OCVWDEOC	Delaware
RHBHDERB	Delaware
SEFRDESF	Delaware
SLVLDESV	Delaware
SMYRDESM	Delaware
TLVLDETV	Delaware
WLMGDEPR	Delaware
WLMGDEWL	Delaware
WRHLDEWH	Delaware

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ABDLFLXA	Florida	BYSHFLXA	Florida	DUNDFLXA	Florida
ALCHFLXA	Florida	CCBHFLAF	Florida	DWPKFLXA	Florida
ALFAFLXA	Florida	CCBHFLMA	Florida	DYBHFLFN	Florida
ALFRFLXA	Florida	CDKYFLMA	Florida	DYBHFLMA	Florida
ALSPFLXA	Florida	CFLDFLMA	Florida	DYBHFLOB	Florida
ALTRFLXA	Florida	CFVLFLXA	Florida	DYBHFLOS	Florida
ALVAFLXA	Florida	CHLKFLXA	Florida	DYBHFLPO	Florida
ANMRFLXA	Florida	CHPLFLJA	Florida	EGLLFLBG	Florida
APPKFLXA	Florida	CHSWFLXA	Florida	EGLLFLIH	Florida
ARCDFLXA	Florida	CHTHFLXA	Florida	ENWDFLXA	Florida
ARCHFLMA	Florida	CITRFLXA	Florida	EORNFLMA	Florida
ASTRFLXA	Florida	CLHNFLXA	Florida	ESTSFLXA	Florida
AVPKFLXA	Florida	CLMTFLXA	Florida	EVRGFLXA	Florida
BAKRFLXA	Florida	CLTNFLXA	Florida	FHSDFLXA	Florida
BARTFLXA	Florida	CLWRFLXA	Florida	FLBHFLMA	Florida
BAYUFLXA	Florida	CNSDFLXA	Florida	FLRHFLXA	Florida
BBPKFLXA	Florida	COCOFLMA	Florida	FMTNALMT	Florida
BCGRFLXA	Florida	COCOFLME	Florida	FRBHFLFP	Florida
BCRTFLBT	Florida	CPCRFLXA	Florida	FRPTFLXA	Florida
BCRTFLMA	Florida	CPCRFLXB	Florida	FRSTFLXA	Florida
BCRTFLSA	Florida	CPHZFLXA	Florida	FTGRFLMA	Florida
BGPIFLMA	Florida	CRCYFLXA	Florida	FTLDFLCR	Florida
BHPKFLXA	Florida	CRRVFLXA	Florida	FTLDFLCY	Florida
BKVFLJF	Florida	CRVWFLXA	Florida	FTLDFLJA	Florida
BLDWFLMA	Florida	CRWDFLXA	Florida	FTLDFLMR	Florida
BLGLFLMA	Florida	CSCYFLBA	Florida	FTLDFOA	Florida
BLTWFLXA	Florida	CSLBFLXA	Florida	FTLDFLPL	Florida
BLVWFLXA	Florida	CTDLFLXA	Florida	FTLDFLSG	Florida
BNFYFLXA	Florida	CYGRFLXA	Florida	FTLDFLSU	Florida
BNNLFLMA	Florida	CYLKFLXA	Florida	FTLDFLWN	Florida
BNSPFLXA	Florida	CYLKFLXB	Florida	FTMBFLXA	Florida
BORAFLXA	Florida	DBRYFLDL	Florida	FTMDFLXA	Florida
BRBAFLXA	Florida	DBRYFLMA	Florida	FTMYFLXA	Florida
BRFRFLXA	Florida	DDCYFLXA	Florida	FTMYFLXB	Florida
BRJTFLXA	Florida	DELDFLMA	Florida	FTMYFLXC	Florida
BRKRFLXA	Florida	DESTFLXA	Florida	FTPRFLMA	Florida
BRNDFLXA	Florida	DFSPFLXA	Florida	FTWBFLXA	Florida
BRSNFLMA	Florida	DLBHFLKP	Florida	FTWBFLXB	Florida
BRTNFLXX	Florida	DLBHFLMA	Florida	FTWBFLXC	Florida
BSHNFLXA	Florida	DLSPFLMA	Florida	FTWHFLXA	Florida
BVHLFLXA	Florida	DNDNFLXA	Florida	GCSPFLCN	Florida
BWLGFLXA	Florida	DNLNFLWM	Florida	GCVLFLMA	Florida
BYBHFLMA	Florida	DRBHFLMA	Florida	GDRGFLXA	Florida

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
GENVFLMA	Florida	JAY FLMA	Florida	LKLDLFXE	Florida
GLBRFLMC	Florida	JCBHFLAB	Florida	LKLDLFXN	Florida
GLDLFLXA	Florida	JCBHFLMA	Florida	LKMRFLHE	Florida
GLGCFLXA	Florida	JCBHFLSP	Florida	LKPCFLXA	Florida
GLRDFLXA	Florida	JCVLFLAR	Florida	LKWFLFLXA	Florida
GNBOFLXA	Florida	JCVLFLBW	Florida	LKWFLFLXE	Florida
GNDYFLXA	Florida	JCVLFLCL	Florida	LLMNFLXA	Florida
GNVLFLXA	Florida	JCVLFLFC	Florida	LNLKFLXA	Florida
GNWDFLXA	Florida	JCVLFLIA	Florida	LRGOFLXA	Florida
GRETFLXA	Florida	JCVLFLJT	Florida	LRVLFLXA	Florida
GSVLFLMA	Florida	JCVLFLLF	Florida	LSBGFLXA	Florida
GSVLFLNW	Florida	JCVLFLNO	Florida	LUTZFLXA	Florida
GVLDFLXA	Florida	JCVLFLOW	Florida	LVOKFLXA	Florida
HAVNFLMA	Florida	JCVLFLRV	Florida	LWTYFLXA	Florida
HBSDFLMA	Florida	JCVLFLSJ	Florida	LYHNFLOH	Florida
HDSNFLXA	Florida	JCVLFLSM	Florida	MALNFLXA	Florida
HGLDFLXA	Florida	JCVLFLWC	Florida	MAYOFLXA	Florida
HGSPFLXA	Florida	JNGSFLXA	Florida	MCINFLXA	Florida
HLNVFLMA	Florida	JPTRFLMA	Florida	MCLNFLXA	Florida
HLRDFLXA	Florida	JSPRFLXA	Florida	MCNPFLMA	Florida
HLWDFLHA	Florida	KGLKFLXA	Florida	MDBGFLPM	Florida
HLWDFLMA	Florida	KNVLFLXA	Florida	MDSNFLXA	Florida
HLWDFLPE	Florida	KSSMFLXA	Florida	MIAMFLAE	Florida
HLWDFLWH	Florida	KSSMFLXB	Florida	MIAMFLAL	Florida
HMSPFLXA	Florida	KSSMFLXC	Florida	MIAMFLAP	Florida
HMSTFLEA	Florida	KSSMFLXD	Florida	MIAMFLBA	Florida
HMSTFLHM	Florida	KYHGFLMA	Florida	MIAMFLBC	Florida
HMSTFLNA	Florida	KYLRFLLS	Florida	MIAMFLBR	Florida
HNCYFLXA	Florida	KYLRFLMA	Florida	MIAMFLCA	Florida
HNCYFLXN	Florida	KYSTFLXA	Florida	MIAMFLDB	Florida
HOWYFLXA	Florida	KYWSFLMA	Florida	MIAMFLFL	Florida
HSNGFLXA	Florida	LBLLFLXA	Florida	MIAMFLGR	Florida
HTISFLMA	Florida	LDLKFLXA	Florida	MIAMFLHL	Florida
HWTHFLMA	Florida	LEE FLXA	Florida	MIAMFLIC	Florida
HYPKFLXA	Florida	LGBKFLXA	Florida	MIAMFLKE	Florida
IMKLFLXA	Florida	LHACFLXA	Florida	MIAMFLME	Florida
INLKFLXA	Florida	LKALFLXA	Florida	MIAMFLNM	Florida
INRKFLXX	Florida	LKBNFLXB	Florida	MIAMFLNS	Florida
INTRFLXA	Florida	LKBRFLXA	Florida	MIAMFLOL	Florida
INTWFLXA	Florida	LKBTFLXA	Florida	MIAMFLPB	Florida
INVRFLXA	Florida	LKCYFLMA	Florida	MIAMFLPL	Florida
IONAFLXA	Florida	LKHLFLXA	Florida	MIAMFLRR	Florida
ISLMFLMA	Florida	LKLDFLXA	Florida	MIAMFLSH	Florida

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MIAMFLSO	Florida	OCALFLXC	Florida	PNSCFLBL	Florida
MIAMFLWD	Florida	OCALFLXJ	Florida	PNSCFLFP	Florida
MIAMFLWM	Florida	OCNFFLXA	Florida	PNSCFLHC	Florida
MICCFLBB	Florida	OKCBFLXA	Florida	PNSCFLPB	Florida
MLBRFLMA	Florida	OKHLFLMA	Florida	PNSCFLWA	Florida
MLBYFLXA	Florida	OKLWFLXA	Florida	PNVDFLMA	Florida
MLRSFLXA	Florida	OLDSFLXA	Florida	POINFLXA	Florida
MLTNFLRA	Florida	OLTWFLLN	Florida	PRRNFLMA	Florida
MNDRFLAV	Florida	ORCYFLXA	Florida	PRRYFLXA	Florida
MNDRFLLO	Florida	ORCYFLXC	Florida	PRSHFLXA	Florida
MNDRFLLW	Florida	ORLDFLAP	Florida	PRSNFLFD	Florida
MNLKFLXA	Florida	ORLDFLCL	Florida	PSDNFLXA	Florida
MNSNFLMA	Florida	ORLDFLMA	Florida	PTCTFLXA	Florida
MNTIFLXA	Florida	ORLDFLPC	Florida	PTCYFLXA	Florida
MOISFLXA	Florida	ORLDFLPH	Florida	PTSJFLXA	Florida
MOLNFLXA	Florida	ORLDFLSA	Florida	PTSLFLMA	Florida
MRDCFLXA	Florida	ORPKFLMA	Florida	PTSLFLSO	Florida
MRHNFLXA	Florida	ORPKFLRW	Florida	QNCYFLXA	Florida
MRNNFLXA	Florida	ORSPFLXA	Florida	RAFRFLXA	Florida
MRTHFLVE	Florida	OSPRFLXA	Florida	RSKNFLXA	Florida
MTDRFLXA	Florida	OVIDFLCA	Florida	RYHLFLXA	Florida
MTLDFLXA	Florida	PACEFLPV	Florida	SARKFLXA	Florida
MTVRFLXA	Florida	PAHKFLMA	Florida	SBNGFLXA	Florida
MXVLFLMA	Florida	PANCFLXA	Florida	SBSTFLFE	Florida
MYCYFLXA	Florida	PCBHFLNT	Florida	SBSTFLMA	Florida
NDADFLAC	Florida	PKCYFLXA	Florida	SCPKFLXA	Florida
NDADFLBR	Florida	PLCSFLMA	Florida	SEKYFLXA	Florida
NDADFLGG	Florida	PLMTFLXA	Florida	SGBEFLXA	Florida
NDADFLOL	Florida	PLSLFLXA	Florida	SGBHFLXA	Florida
NFMYFLXA	Florida	PLTKFLMA	Florida	SGKYFLMA	Florida
NFMYFLXB	Florida	PMBHFLCS	Florida	SHLMFLXA	Florida
NGBHFLXA	Florida	PMBHFLFE	Florida	SKWYFLXA	Florida
NKLRFLMA	Florida	PMBHFLMA	Florida	SLHLFLXA	Florida
NNPLFLXA	Florida	PMBHFLNP	Florida	SLSPFLXA	Florida
NPLSFLXC	Florida	PMBHFLTA	Florida	SMNLFLXA	Florida
NPLSFLXD	Florida	PMPKFLMA	Florida	SNANFLXA	Florida
NPRCFLXA	Florida	PNCRFLXA	Florida	SNDSFLXA	Florida
NRPTFLXA	Florida	PNCYFLCA	Florida	SNFRFLMA	Florida
NRSDFLXA	Florida	PNCYFLMA	Florida	SNISFLXA	Florida
NSBHFLMA	Florida	PNGRFLXA	Florida	SNRSFLXA	Florida
NWBYFLMA	Florida	PNISFLXA	Florida	SNSNFLXA	Florida
OCALFLXA	Florida	PNLNFLXA	Florida	SNSPFLXA	Florida
OCALFLXB	Florida	PNLSFLXA	Florida	SPBGFLXA	Florida

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
SPBGFLXS	Florida	VLPRFLXB	Florida
SPCPFLXA	Florida	VRBHFLBE	Florida
SPRGFLXA	Florida	VRBHFLMA	Florida
SRSTFLXA	Florida	WALDFLXA	Florida
SSDSFLXA	Florida	WCHLFLXA	Florida
SSPRFLXA	Florida	WELKFLMA	Florida
STAGFLBS	Florida	WHSPFLXA	Florida
STAGFLMA	Florida	WIMMFLXA	Florida
STAGFLSH	Florida	WLBRFLXA	Florida
STAGFLWG	Florida	WLCHFLXA	Florida
STCDFLXA	Florida	WLCRFLXA	Florida
STGRFLXA	Florida	WLHLFLXA	Florida
STMKFLXA	Florida	WLSTFLXA	Florida
STRKFLXA	Florida	WLWDFLXA	Florida
STRTFLMA	Florida	WNDRFLXA	Florida
SVSPFLXA	Florida	WNGRFLXA	Florida
SVSSFLXA	Florida	WNHNFLXC	Florida
SWTHFLXA	Florida	WNPKFLXA	Florida
SYHSFLCC	Florida	WPBHFLAN	Florida
TAFBFLXA	Florida	WPBHFLGA	Florida
TAMPFLXE	Florida	WPBHFLGR	Florida
TAMPFLXX	Florida	WPBHFLHH	Florida
THNTFLXA	Florida	WPBHFLLE	Florida
TLCHFLXA	Florida	WPBHFLRB	Florida
TLHSFLXA	Florida	WPBHFLRP	Florida
TLHSFLXB	Florida	WSSDFLXA	Florida
TLHSFLXC	Florida	WSTVFLXA	Florida
TLHSFLXD	Florida	WWSPFLHI	Florida
TLHSFLXE	Florida	WWSPFLSH	Florida
TLHSFLXF	Florida	YBCTFLXA	Florida
TLHSFLXG	Florida	YNFNFLMA	Florida
TLHSFLXH	Florida	YNTWFLMA	Florida
TMTRFLXA	Florida	YULEFLMA	Florida
TRENFLMA	Florida	ZLSPFLXA	Florida
TRSPFLXA	Florida		
TTVLFLMA	Florida		
TVRSFLXA	Florida		
UMTLFLXA	Florida		
UNVRFLXA	Florida		
VENCFLXA	Florida		
VENCFLXS	Florida		
VERNFLMA	Florida		
VLPRFLXA	Florida		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ZPHYFLXA	North Carolina	BRWYNCSA	North Carolina	CNTNNCSA	North Carolina
ABBGNCXA	North Carolina	BSCYNCMA	North Carolina	CNVLNCXA	North Carolina
ABRDNCXA	North Carolina	BSLKNCXA	North Carolina	COHRNCXA	North Carolina
ACMENCMA	North Carolina	BUFTNCXA	North Carolina	COLMNCXA	North Carolina
ADVNNCSA	North Carolina	BURLNCDA	North Carolina	CPHLNCRO	North Carolina
AHVLNCBI	North Carolina	BURLNCEL	North Carolina	CRBHNCCE	North Carolina
AHVLNCOH	North Carolina	BURLNCHA	North Carolina	CRDMNCXA	North Carolina
AHVLNCOT	North Carolina	BYBONCSA	North Carolina	CRDMNCXM	North Carolina
ALBMNCXA	North Carolina	CARYNCCE	North Carolina	CRLNNCSA	North Carolina
ALTNNCSA	North Carolina	CARYNCWS	North Carolina	CRTHNCXA	North Carolina
ANGRNCXA	North Carolina	CETNNCSA	North Carolina	CRTYNCXA	North Carolina
APEXNCCE	North Carolina	CHDBNCXA	North Carolina	CSHRNCXA	North Carolina
ARDNNCCE	North Carolina	CHGVNCXA	North Carolina	CSHYNCMA	North Carolina
ASBONCSA	North Carolina	CHLDNCXA	North Carolina	CTWBNCXA	North Carolina
ASBONCSB	North Carolina	CHMPNCSA	North Carolina	CYTNNCSA	North Carolina
ASVLNCXA	North Carolina	CHRNCSXB	North Carolina	DBSNNCSB	North Carolina
ATSNNCSA	North Carolina	CHRLNCBO	North Carolina	DNBRNCXA	North Carolina
AYDNNCSA	North Carolina	CHRLNCSA	North Carolina	DNTNNCSA	North Carolina
BADNNCSA	North Carolina	CHRLNCCE	North Carolina	DNVRNCMA	North Carolina
BALYNCXA	North Carolina	CHRLNCCR	North Carolina	DRHMNCXA	North Carolina
BCMTNCCE	North Carolina	CHRLNCDE	North Carolina	DRHMNCXB	North Carolina
BDLKNCXA	North Carolina	CHRLNCER	North Carolina	DRHMNCXC	North Carolina
BDVLNCXA	North Carolina	CHRLNCLP	North Carolina	DRHMNCXD	North Carolina
BELHNCXA	North Carolina	CHRLNCMI	North Carolina	DRHMNCXE	North Carolina
BEMTNCXA	North Carolina	CHRLNCOD	North Carolina	DRHMNCXG	North Carolina
BEVLNCXA	North Carolina	CHRLNCRE	North Carolina	DRHMNCXH	North Carolina
BHLHNCXA	North Carolina	CHRLNCSH	North Carolina	DRHMNCXM	North Carolina
BISNCXA	North Carolina	CHRLNCTH	North Carolina	DRHMNCXT	North Carolina
BLDWNCXA	North Carolina	CHRLNCUN	North Carolina	DRPRNCXA	North Carolina
BLMTNCCE	North Carolina	CHVLNCCE	North Carolina	DUNNNCSA	North Carolina
BLRKNCSA	North Carolina	CKTNNCSA	North Carolina	DVSNNCPO	North Carolina
BNELNCXA	North Carolina	CLEVNCMA	North Carolina	EBNDNCXA	North Carolina
BNSNNCSA	North Carolina	CLMBNCXA	North Carolina	EDENNCXB	North Carolina
BNVLNCXA	North Carolina	CLMTNCMA	North Carolina	EDTNNCSA	North Carolina
BOLVNCXA	North Carolina	CLNGNCXA	North Carolina	ELBONCSA	North Carolina
BOMRNCXA	North Carolina	CLRGNCXA	North Carolina	ELCYNCXA	North Carolina
BONLNCXA	North Carolina	CLRNNCSA	North Carolina	ELKNNCSA	North Carolina
BOONNCKI	North Carolina	CLTNNCSA	North Carolina	ELRBNCXA	North Carolina
BRCYNCXA	North Carolina	CLWHNCXA	North Carolina	EMCYNCXA	North Carolina
BRGWNCMA	North Carolina	CLYDNCMA	North Carolina	ENFDNCXA	North Carolina
BRKSNCXA	North Carolina	CNCRNCXA	North Carolina	ENKANCSA	North Carolina
BRVLNCXA	North Carolina	CNDRNCXA	North Carolina	FAMTNCMA	North Carolina
BRVRNCXA	North Carolina	CNJNCXA	North Carolina	FASNNCSA	North Carolina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
FKTNXCXA	North Carolina	HCKRNCXB	North Carolina	KNPLNCXA	North Carolina
FONTNCXA	North Carolina	HGHFNCXA	North Carolina	KNVLNCXA	North Carolina
FQVRNCXA	North Carolina	HGPNNCXA	North Carolina	KRVLNCXA	North Carolina
FRBSNCXB	North Carolina	HGPNNCXB	North Carolina	KSTNNCXA	North Carolina
FRCYNCCE	North Carolina	HGPNNCXC	North Carolina	LBRTNCXA	North Carolina
FRMRNCXA	North Carolina	HGPNNCXD	North Carolina	LCSRNCMA	North Carolina
FRMTNCXA	North Carolina	HGPNNCXE	North Carolina	LCSTNCMA	North Carolina
FROKNCXA	North Carolina	HGPNNCXF	North Carolina	LENRNCHA	North Carolina
FRVLNCXA	North Carolina	HLBHNCXB	North Carolina	LENRNCHU	North Carolina
FRVWNCMA	North Carolina	HLBONCXB	North Carolina	LGRNNCXA	North Carolina
FYVLNCXA	North Carolina	HLDBNCXB	North Carolina	LGWDNCXA	North Carolina
FYVLNCXB	North Carolina	HLFXNCXA	North Carolina	LKLRCNCCE	North Carolina
FYVLNCXD	North Carolina	HLRGNCXA	North Carolina	LKWCNCXA	North Carolina
FYVLNCXF	North Carolina	HMBRNCXA	North Carolina	LLTNNCXA	North Carolina
FYVLNCXG	North Carolina	HMLTNCMA	North Carolina	LLVLNCXA	North Carolina
GBSNNCMA	North Carolina	HNSNNCXA	North Carolina	LMTNNCMA	North Carolina
GBVLNCXA	North Carolina	HNVLNCCH	North Carolina	LNBNHCMA	North Carolina
GFTNNCXA	North Carolina	HNVLNCED	North Carolina	LNNGNCXA	North Carolina
GLBONCAD	North Carolina	HNVLNCMI	North Carolina	LNTNNCMA	North Carolina
GLBONCMA	North Carolina	HRBGNCXA	North Carolina	LNTNNCVA	North Carolina
GLCKNCXA	North Carolina	HRFRNCXA	North Carolina	LOMXNCXA	North Carolina
GLDSNCXA	North Carolina	HRFRTNMA	North Carolina	LRBGNCMA	North Carolina
GNBONCAP	North Carolina	HRLSNCXA	North Carolina	LRHLNCXA	North Carolina
GNBONCAS	North Carolina	HRMYNCXA	North Carolina	LSBGNCXA	North Carolina
GNBONCEU	North Carolina	HRNGNCXA	North Carolina	LSBNNCXA	North Carolina
GNBONCHO	North Carolina	HSVLNCCE	North Carolina	LTMRNCCE	North Carolina
GNBONCLA	North Carolina	HTSPNCXA	North Carolina	LTTNNCXA	North Carolina
GNBONCMC	North Carolina	HVLCNCXA	North Carolina	LUCMNCXA	North Carolina
GNBONCPG	North Carolina	HYVLNCXA	North Carolina	LVCRCNCXA	North Carolina
GNHMNCMA	North Carolina	IJAMNCXA	North Carolina	LWDLNCCE	North Carolina
GNVLNCXA	North Carolina	INTRNCXA	North Carolina	LWLLNCMA	North Carolina
GNVLNCXB	North Carolina	JCVLNCXA	North Carolina	LWVLNCXA	North Carolina
GRCKNCXA	North Carolina	JCVLNCXB	North Carolina	LXTNNCXA	North Carolina
GRCYNCXA	North Carolina	JKCKNCXA	North Carolina	LXTNNCXB	North Carolina
GRFLNCXA	North Carolina	JULNNCMA	North Carolina	LXTNNCXC	North Carolina
GRQYNCXA	North Carolina	KDHLNCXA	North Carolina	LXTNNCXD	North Carolina
GSKKNCXA	North Carolina	KDHLNCXB	North Carolina	LXTNNCXE	North Carolina
GSTANCD A	North Carolina	KGMTNCMA	North Carolina	MADNNCCE	North Carolina
GSTANCSO	North Carolina	KINGNCXA	North Carolina	MAMINCXA	North Carolina
GTTWNCXA	North Carolina	KLLYNCXA	North Carolina	MANTNCXA	North Carolina
GWPRNCXA	North Carolina	KNDLNCCE	North Carolina	MARNNCXB	North Carolina
HAYSNCXA	North Carolina	KNISNCXA	North Carolina	MDSNNCXA	North Carolina
HCKRNCXA	North Carolina	KNLYNCXA	North Carolina	MEBNNCXA	North Carolina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MGTNNCGL	North Carolina	OLIVNCXA	North Carolina	RRHLNCXA	North Carolina
MGTNNCGR	North Carolina	OLTWNCXA	North Carolina	RSBONCXA	North Carolina
MGVANCCE	North Carolina	ORNTNCXA	North Carolina	RSHLNCXA	North Carolina
MHVLNCXA	North Carolina	OXFRNCXA	North Carolina	RWLDNCMA	North Carolina
MIVLNCXA	North Carolina	PCLDNCXA	North Carolina	RXBONCXA	North Carolina
MKVLNCXA	North Carolina	PCVLNCXA	North Carolina	SALDNCXA	North Carolina
MLBYNCXB	North Carolina	PIVLNCXB	North Carolina	SBRDNCXA	North Carolina
MNPLNCXA	North Carolina	PKHLNCXA	North Carolina	SCHLNCHA	North Carolina
MNTINCMA	North Carolina	PKTNNCXA	North Carolina	SCHLNCMA	North Carolina
MONRNCXA	North Carolina	PLMTNCXA	North Carolina	SCVLNCXA	North Carolina
MOYCNCXA	North Carolina	PMBRNCCE	North Carolina	SEGVNCXA	North Carolina
MOYCNCXB	North Carolina	PNBLNCXA	North Carolina	SELMNCMA	North Carolina
MRBGNCXA	North Carolina	PNHRNCXA	North Carolina	SESDNCXB	North Carolina
MRCYNCXA	North Carolina	PNTPNCXA	North Carolina	SEVRNCXA	North Carolina
MRHLNCXA	North Carolina	PNTWNCXA	North Carolina	SGGVNCXA	North Carolina
MRPHNCXB	North Carolina	PRTNNCXA	North Carolina	SHFRNCXA	North Carolina
MRSHNCXA	North Carolina	PSGHNCXA	North Carolina	SHLBNCMA	North Carolina
MRVINCX	North Carolina	PTBONCXA	North Carolina	SHLHNCXA	North Carolina
MRVNNCXA	North Carolina	PYWDNCXA	North Carolina	SHLSNCXA	North Carolina
MSHLNCXA	North Carolina	QKGPNCXA	North Carolina	SHLTNCXA	North Carolina
MTARNCXA	North Carolina	RAFDNCXA	North Carolina	SLBRNCMA	North Carolina
MTGLNCXA	North Carolina	RCHMNCMA	North Carolina	SLCYNCXA	North Carolina
MTHLNCMA	North Carolina	RCLDNCXA	North Carolina	SLVLNCXA	North Carolina
MTHWNCXB	North Carolina	RCMTNCXA	North Carolina	SMFDNCXA	North Carolina
MTOLNCCE	North Carolina	RCMTNCXB	North Carolina	SMNTNCXA	North Carolina
MTVWNCXA	North Carolina	RDBSNCXA	North Carolina	SNBYNCXA	North Carolina
MXTNNCXA	North Carolina	RDSPNCXA	North Carolina	SNFRNCXA	North Carolina
MYVLNCXA	North Carolina	RDVLNCMA	North Carolina	SNFYNCXA	North Carolina
NRLNNCXA	North Carolina	RDVLNCSI	North Carolina	SNHLNCXA	North Carolina
NRWDNCXA	North Carolina	REDSNCXA	North Carolina	SNRGNCXA	North Carolina
NSVLNCXA	North Carolina	RFFNNCMA	North Carolina	SOPTNCCE	North Carolina
NTCKNCXA	North Carolina	RLGHNCDU	North Carolina	SORVNCXA	North Carolina
NWBONCXA	North Carolina	RLGHNCGA	North Carolina	SPNSNCXA	North Carolina
NWBRNCXA	North Carolina	RLGHNCGL	North Carolina	SPPNNCMA	North Carolina
NWGVNCXA	North Carolina	RLGHNCHO	North Carolina	SPRHNCXA	North Carolina
NWHPNCXA	North Carolina	RLGHNCJO	North Carolina	SPRTNCXA	North Carolina
NWLDNCCE	North Carolina	RLGHNCMO	North Carolina	SRFDNCCE	North Carolina
NWLNNCXA	North Carolina	RLGHNCSE	North Carolina	SSVLNCJE	North Carolina
NWPTNCXA	North Carolina	RLGHNCSI	North Carolina	SSVLNCMA	North Carolina
NWSLNCXA	North Carolina	RMSRNCXA	North Carolina	STBGNCXA	North Carolina
NWTNNCMA	North Carolina	RNMNNCXA	North Carolina	STMLNCXA	North Carolina
OKBONCXA	North Carolina	RNRPNCXA	North Carolina	STNLNCCE	North Carolina
OLFTNCXA	North Carolina	RRGPNCXA	North Carolina	STPLNCXA	North Carolina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
STPNNCMA	North Carolina	WLLCNCXA	North Carolina
STRDNCXA	North Carolina	WLMGNCFO	North Carolina
STVLNCXA	North Carolina	WLMGNCLE	North Carolina
SWNNNCMA	North Carolina	WLMGNCWI	North Carolina
SWNSNCXA	North Carolina	WLSNNCXA	North Carolina
SWNSNCXB	North Carolina	WNDLNCPI	North Carolina
SXPHNCMA	North Carolina	WNGTNCXA	North Carolina
SXRNNCXA	North Carolina	WNSLNCAR	North Carolina
SYVLNCXA	North Carolina	WNSLNCCL	North Carolina
TBCYNCXA	North Carolina	WNSLNCFI	North Carolina
THVLNCXA	North Carolina	WNSLNCGL	North Carolina
TMLKNCXA	North Carolina	WNSLNCLE	North Carolina
TPISNCXA	North Carolina	WNSLNCVI	North Carolina
TRBONCXA	North Carolina	WNSLNCWA	North Carolina
TRENNCXA	North Carolina	WNSLNCWH	North Carolina
TRMNNCMA	North Carolina	WRSWNCXA	North Carolina
TROYNCXA	North Carolina	WRTNNCXA	North Carolina
TRYNNCXA	North Carolina	WSFDNCXA	North Carolina
TYVLNCMA	North Carolina	WVVLNCXA	North Carolina
UNGVNCXB	North Carolina	WXHWNCXA	North Carolina
VASSNCXA	North Carolina	WYVLNCMA	North Carolina
VLDSNCXA	North Carolina	YDVLNCXA	North Carolina
VNBONCXA	North Carolina	ZBLNNCCE	North Carolina
WASHNCXA	North Carolina		
WATGNCXA	North Carolina		
WAVSNCXA	North Carolina		
WDBONCXA	North Carolina		
WDVLNCXA	North Carolina		
WENDNCXB	North Carolina		
WGRMNCXA	North Carolina		
WGVLCMA	North Carolina		
WHOKNCXA	North Carolina		
WHPNNCXA	North Carolina		
WHTKNCXA	North Carolina		
WHVLNCXA	North Carolina		
WJSNNCXA	North Carolina		
WKFSNCXA	North Carolina		
WKTWNCXA	North Carolina		
WKVLNCXA	North Carolina		
WLCHNCXA	North Carolina		
WLCMNCXA	North Carolina		
WLCVNCXA	North Carolina		
WLDNNCXA	North Carolina		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ZPHYNCXA	New Hampshire	GNFDNHMA	New Hampshire	RYBHNHCE	New Hampshire
ALSTNHLI	New Hampshire	GNVLNHAD	New Hampshire	RYMNNHFL	New Hampshire
ANDVNHXA	New Hampshire	HLBONHXA	New Hampshire	SALMNHNB	New Hampshire
ASLDNHHI	New Hampshire	HLLSNHXA	New Hampshire	SBRKNHNR	New Hampshire
ATSNNHMA	New Hampshire	HMPNNHWI	New Hampshire	SBVLNHCS	New Hampshire
BDFRNHAM	New Hampshire	HMPSNHMA	New Hampshire	SLBRNHXA	New Hampshire
BLMTNHMA	New Hampshire	HNDLNHMA	New Hampshire	SNCKNHPA	New Hampshire
BNTONHPR	New Hampshire	HNKRNHXA	New Hampshire	SPFRNHMS	New Hampshire
BRFRNHXA	New Hampshire	HNVRNHSC	New Hampshire	STTNNHXA	New Hampshire
BRNSNHXA	New Hampshire	HRVLNHMA	New Hampshire	SUNPNHMC	New Hampshire
BRSTNHSP	New Hampshire	JCSNNHTH	New Hampshire	TLTNNHPR	New Hampshire
BRTLNHGE	New Hampshire	JFRYNHRI	New Hampshire	TMWONHWH	New Hampshire
BSCWNHXA	New Hampshire	KEENNHWA	New Hampshire	TROYNHPR	New Hampshire
CANDNHDE	New Hampshire	KGTNNHBA	New Hampshire	WEARNHXA	New Hampshire
CHCHNHXA	New Hampshire	LACNNHNM	New Hampshire	WERSNHST	New Hampshire
CHESNHXA	New Hampshire	LBNNNHBA	New Hampshire	WLBONHGS	New Hampshire
CHTWNHBR	New Hampshire	MDSNNHYA	New Hampshire	WLPLNHWP	New Hampshire
CLMTNHBR	New Hampshire	MLFRNHSO	New Hampshire	WLTONHXA	New Hampshire
CMTNNHOW	New Hampshire	MNCHNHCO	New Hampshire	WMLDNHWE	New Hampshire
CNBNNHXA	New Hampshire	MRBONHYA	New Hampshire	WNCHNHMI	New Hampshire
CNCRNHCO	New Hampshire	MRDNNHXA	New Hampshire	WNDSVTPI	New Hampshire
CNHRNHPL	New Hampshire	MRDTNHWA	New Hampshire		
CNOSNHFO	New Hampshire	MRMCNHYA	New Hampshire		
CNTCNHXA	New Hampshire	MTMLNHWE	New Hampshire		
CNTRNHSH	New Hampshire	NASHNHGR	New Hampshire		
CNWYNHYA	New Hampshire	NASHNHWP	New Hampshire		
DBLNNHMO	New Hampshire	NCWYNHKE	New Hampshire		
DNBRNHDB	New Hampshire	NWDRNHXA	New Hampshire		
DNTNNHXA	New Hampshire	NWDSNHMA	New Hampshire		
DOVRNHTH	New Hampshire	NWLNNHXA	New Hampshire		
DRFDNHCC	New Hampshire	NWMRNHGE	New Hampshire		
DRHMNHMC	New Hampshire	NWODNHYA	New Hampshire		
DRRYNHEB	New Hampshire	NWPTNHMA	New Hampshire		
ENFDNHNM	New Hampshire	PLHMNHBR	New Hampshire		
EPNGNHMA	New Hampshire	PLMONHLH	New Hampshire		
EPSMNHBB	New Hampshire	PLSTNHMA	New Hampshire		
EXTRNHCE	New Hampshire	PNCKNHCH	New Hampshire		
FKLNNHFR	New Hampshire	PTFDNHBR	New Hampshire		
FRTNNHMG	New Hampshire	PTMONHIS	New Hampshire		
FTZWNHUT	New Hampshire	PTRBNHCO	New Hampshire		
GFTWNHWH	New Hampshire	RMNYNHSL	New Hampshire		
GLDLNHAB	New Hampshire	RNDGNHCE	New Hampshire		
GLTNNHXA	New Hampshire	ROCHNHWE	New Hampshire		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
WRNRNHXA	New York	BFLONYBA	New York	CHHMNYXA	New York
ADCTNYXA	New York	BFLONYEL	New York	CHKTNYFR	New York
ADMSNYXA	New York	BFLONYFR	New York	CHMGNYXA	New York
AFTNNYXA	New York	BFLONYHE	New York	CHMTNYXA	New York
AKRNNYAK	New York	BFLONYMA	New York	CHPLNYAJ	New York
ALBNNYAI	New York	BFLONYSP	New York	CHPQNYCP	New York
ALBYNYGD	New York	BGFLNYBF	New York	CHTGNYZH	New York
ALBYNYSS	New York	BITNNYXA	New York	CHTQNYXA	New York
ALBYNYWA	New York	BLFSNYBZ	New York	CHVYNYZV	New York
ALDNNYAD	New York	BLLNNYBG	New York	CHZYNYXA	New York
ALFENYXA	New York	BLMTNYBM	New York	CICRNYCJ	New York
ALMDNYXA	New York	BLRVNYBC	New York	CKVLNYXA	New York
ALMTNYAL	New York	BLVLNYXA	New York	CLAYNYOS	New York
AMBRNYAB	New York	BMBGNYXA	New York	CLCNNYCN	New York
AMENNYAN	New York	BMPNNYXA	New York	CLCRNYCC	New York
AMHRNYMP	New York	BNBRNYXA	New York	CLCTNYCC	New York
AMSTNYPE	New York	BNGHNYHY	New York	CLDNNYXA	New York
ANDVNYXA	New York	BNGHNYRO	New York	CLEVNYCE	New York
ANGENYAG	New York	BNVLNYXA	New York	CLNCNYBA	New York
ANGLNYAO	New York	BRDBNYXA	New York	CLPKNYCP	New York
APLCNYXA	New York	BRDTNYXA	New York	CLSPNYXA	New York
ARCDNYAE	New York	BRGNNYXA	New York	CLTNNYZI	New York
ARGYNYAY	New York	BRKRNYBK	New York	CLVLNYCK	New York
ARPTNYAR	New York	BRLNNYXA	New York	CLVRNYCV	New York
ARVGNYAV	New York	BRMVNYXA	New York	CLYDNYCY	New York
ASFKNYXA	New York	BRPTNYBP	New York	CLYMNYXA	New York
ATLNNYXA	New York	BRTNNYXA	New York	CMBRNYCM	New York
ATTCNYAT	New York	BRWDNYBW	New York	CMDNNYZM	New York
ATWPNYAW	New York	BRWSNYBW	New York	CMLSNYID	New York
AUBNNYAU	New York	BSTNNYBN	New York	CMLSNYON	New York
AVOCNYAC	New York	BYRNNYBY	New York	CMMKNYCM	New York
AVONNYXA	New York	BYSHNYBY	New York	CMPBNYCP	New York
AVPKNYAV	New York	CAIRNYCA	New York	CNBRNYCD	New York
AXBANYAX	New York	CANDNYXA	New York	CNDLNYCL	New York
BALSNYBA	New York	CANNNYXA	New York	CNDRNYXA	New York
BATHNYBH	New York	CANSNYCZ	New York	CNGRNYCN	New York
BATVNYBT	New York	CATONYXA	New York	CNJHNYXA	New York
BAVLNYBV	New York	CBLSNYZB	New York	CNSQNYXA	New York
BBYLYBN	New York	CCVLNYXA	New York	CNSRNYCX	New York
BCPTNYXA	New York	CHBRNYXA	New York	CNSTNYZA	New York
BDVGNYBV	New York	CHCKNYCE	New York	CNTNNYZO	New York
BECNNYBE	New York	CHCNNYXA	New York	CNTTNYCI	New York
BERNNYBR	New York	CHESNYXA	New York	COPKNYXA	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
CORFNYXA	New York	DVPLNYDP	New York	FTANNYFA	New York
COTNNY56	New York	DVPTNYDT	New York	FTPLNYXA	New York
CPNHNYZP	New York	DXTRNYXA	New York	FWBGNYXA	New York
CPTWNYZW	New York	EAURNYEA	New York	FYTTNYFY	New York
CPVNNYXA	New York	EDENNYED	New York	FYVLNYFV	New York
CRGHNYXA	New York	EGLVNYGL	New York	GDISNYGI	New York
CRHDNYCH	New York	EGNBNYEG	New York	GENSNYXA	New York
CRLDNYCR	New York	EHTNNYEH	New York	GENVNYGN	New York
CRMLNYCL	New York	ELBANYEB	New York	GLCVNYGC	New York
CRNGNYCG	New York	ELCVNYEV	New York	GLENNYXA	New York
CRNTNYXA	New York	ELDPNYEU	New York	GLFLNYGF	New York
CRNWNYSW	New York	ELTNNYXA	New York	GLVVNYXA	New York
CRTHNYZG	New York	ELVLNYEL	New York	GLWYNYGW	New York
CRVLNYXA	New York	EMIRNYEM	New York	GMTWNYXA	New York
CSDGNYXA	New York	ENDCNYEN	New York	GNBGNYFV	New York
CSPPNYCS	New York	ENPTNYEN	New York	GNWCNYGW	New York
CSTNNYCS	New York	EPMBNYXA	New York	GPTSNYGP	New York
CTBRNYCB	New York	ERCHNYXA	New York	GRCTNYGC	New York
CTCHNYCU	New York	ESPRNYER	New York	GRCYNYGC	New York
CTNGNYCH	New York	ETNANYXA	New York	GRGRNYGG	New York
CTONNYZN	New York	EVMLNYEI	New York	GRLKNYGL	New York
CTRGNYSO	New York	EZTWNYEZ	New York	GRNENYXA	New York
CTSKNYCT	New York	EZVLNYXA	New York	GRNKNYGN	New York
CUBANYEM	New York	FABSNYFB	New York	GRRYNYXA	New York
CXSCNYXA	New York	FAPTNYXB	New York	GRSNNYGA	New York
CYTNNYZY	New York	FILKNYXA	New York	GRTNNYGT	New York
CYVLNYXA	New York	FKLNNYXA	New York	GRVGNYGV	New York
CZNVNYXA	New York	FLBGNYFB	New York	GRVINYGE	New York
DARNNYXA	New York	FLPKNYFP	New York	GSHNNYXA	New York
DBFYNYDF	New York	FLRDNYXA	New York	GSPTNYGP	New York
DELHNYXA	New York	FLSCNYFM	New York	GVRNNYGO	New York
DLGVNYDG	New York	FLTNNYXA	New York	GWNDNYGD	New York
DLMRNYDA	New York	FONDNYXA	New York	HBRTNYHZ	New York
DLSNNYDL	New York	FOPTNYXA	New York	HCVLNYHV	New York
DNKRNYDK	New York	FRDLNYFM	New York	HDFLNYMS	New York
DNMRNYDN	New York	FRDNNYXA	New York	HDSNNYHD	New York
DNSVNYXA	New York	FRHDNYFH	New York	HERMNYXA	New York
DNTNNYXA	New York	FRPTNYFP	New York	HGLDNYHG	New York
DPSTNYXA	New York	FRSHNYFS	New York	HHFLNYHF	New York
DRBYNYDB	New York	FRTNNYXA	New York	HIFLNYHF	New York
DRPKNYDP	New York	FSHKNYLD	New York	HIMLNYXA	New York
DRYDNYXA	New York	FSISNYXF	New York	HLCMNYXA	New York
DSVLNYXA	New York	FSVLNYFL	New York	HLDLNYXA	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
HLLDNYHO	New York	KGTNNYKG	New York	MAINNYME	New York
HLLYNYHE	New York	KNBONYXA	New York	MARNNYMR	New York
HLPTNYXA	New York	KNDRNYXA	New York	MARVNYMV	New York
HLTNNYXA	New York	KNDYNYXA	New York	MCDGNYMD	New York
HMBGNYHB	New York	KNVYNYKV	New York	MCGRNYMG	New York
HMBYNYHB	New York	KRHNNYKR	New York	MCHVNYMC	New York
HMLCNYXA	New York	KSVLNYXA	New York	MCLNNYMZ	New York
HMLNNYXA	New York	KTBANYKB	New York	MDLBNYXA	New York
HMPSTNYHS	New York	KTNHNYKA	New York	MDLVNYXA	New York
HMPTNYXA	New York	LBRTNYLB	New York	MDPTNYMP	New York
HNBLNYXA	New York	LCPTNYLK	New York	MDRDNYMK	New York
HNCCNYXA	New York	LCSRNYXA	New York	MDTWNYXA	New York
HNDLNYHI	New York	LFRVNYLE	New York	MEDNNYPA	New York
HNRTNYXA	New York	LFYTNYLF	New York	MEXCNYMX	New York
HNSNNYXA	New York	LHSTNYLH	New York	MHPCNYMP	New York
HNSTNYHU	New York	LIVNNYXA	New York	MINLNYMI	New York
HNTRNYHN	New York	LKGRNYLR	New York	MINONYMI	New York
HOFLNYXA	New York	LKKTNYLK	New York	MIVLNYNV	New York
HOMRNYHM	New York	LKPCNYLA	New York	MLBKNYML	New York
HONYNYXA	New York	LKWDNYXA	New York	MLFRNYMU	New York
HPJTNYXB	New York	LMSTNYLM	New York	MLLTNYXA	New York
HRFRNYHR	New York	LNBNHNYLB	New York	MLTNNYMN	New York
HRKMNYHC	New York	LNCSTNYLC	New York	MMRNNYMA	New York
HRNLNYHL	New York	LNNGNYLG	New York	MNHSNYMH	New York
HRSNNYHN	New York	LODINYXA	New York	MNLSNYXA	New York
HRSVNYXA	New York	LOWVNYXA	New York	MNTINYMT	New York
HRWKNYHW	New York	LRMTNYLA	New York	MNTKNYMT	New York
HSFLNYHS	New York	LROYNYXA	New York	MNVLNYXA	New York
HSHDNYHH	New York	LSTNNYLW	New York	MONRNYXA	New York
HVTNNYHX	New York	LTFLNYLS	New York	MORSNYXA	New York
HWTNNYXA	New York	LTHMNYTS	New York	MORVNYMO	New York
HYPKNYHK	New York	LTVYNYLI	New York	MRBONYMB	New York
ILINNYIL	New York	LVMNNYLV	New York	MRCLNYXA	New York
INTRNYXA	New York	LVTWNYLT	New York	MRTNHYXA	New York
ITHCNYIH	New York	LXTNNYLX	New York	MRVLNYXA	New York
ITHCNYPG	New York	LYBRNYLB	New York	MSPQNYMP	New York
JAVANYJA	New York	LYCMNYAE	New York	MSSNNYMQ	New York
JHCYNYJC	New York	LYFLNYXA	New York	MSTCNYMC	New York
JHTWNYXA	New York	LYNSNYLY	New York	MSVLNYXA	New York
JMTWNYXA	New York	LYSNNYXA	New York	MTGMNYXA	New York
JNVLNYJV	New York	LYVLNYLL	New York	MTKSNYMK	New York
JRDNNYJD	New York	LZRNNYXA	New York	MTMRNYXA	New York
KENDNYKD	New York	MACDNYMC	New York	MTVRNYMV	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MUNVNYXA	New York	NYCKNYCL	New York	NYCRNYND	New York
MYBKNYXA	New York	NYCKNYFA	New York	NYCRNYNS	New York
MYFDNYXA	New York	NYCKNYFT	New York	NYCRNYSS	New York
MYVLNYXA	New York	NYCKNYKP	New York	NYCRNYWS	New York
NASSNYXA	New York	NYCKNYLA	New York	NYCXNYCI	New York
NCHINYXA	New York	NYCKNYRA	New York	NYCXNYCR	New York
NCHLNYNL	New York	NYCKNYTY	New York	NYCXNYGC	New York
NCLNNYNO	New York	NYCKNYWM	New York	NYCXNYHO	New York
NCLVNYNC	New York	NYCMNY13	New York	NYCXNYJE	New York
NGFLNY76	New York	NYCMNY18	New York	NYCXNYKB	New York
NGFLNYPO	New York	NYCMNY30	New York	NYCXNYMH	New York
NGFLNYWO	New York	NYCMNY36	New York	NYCXNYTB	New York
NGRNNYNG	New York	NYCMNY37	New York	NYCXNYTR	New York
NPLSNYXA	New York	NYCMNY42	New York	OCBHNYOB	New York
NROSNYNR	New York	NYCMNY50	New York	ODSSNYXA	New York
NRVLNYXA	New York	NYCMNY56	New York	OKFDNYOK	New York
NRWCNYXA	New York	NYCMNY73	New York	OKHLNYOH	New York
NRWDNYND	New York	NYCMNY79	New York	OLENNYHA	New York
NSYRNYNS	New York	NYCMNY97	New York	ONEDNYOD	New York
NUNDNYXA	New York	NYCMNYBS	New York	ONNTNYOA	New York
NVVLNYXA	New York	NYCMNYCA	New York	ONTRNYON	New York
NWBRNYNW	New York	NYCMNYMN	New York	ORBGNYOB	New York
NWBRNYWT	New York	NYCMNYTH	New York	ORFLNYXA	New York
NWCYNYNC	New York	NYCMNYVS	New York	ORPKNYST	New York
NWFDNYNF	New York	NYCMNYWA	New York	OSNGNYOS	New York
NWFNNYMA	New York	NYCMNYWS	New York	OSWGNYSO	New York
NWPLNYNP	New York	NYCMNYZO	New York	OTEGNYOT	New York
NWPTNYXA	New York	NYCQNYAS	New York	OTVLNYXA	New York
NWRCNYNR	New York	NYCQNYBA	New York	OVIDNYXA	New York
NWRKNYNK	New York	NYCQNYBH	New York	OWEGNYOW	New York
NWWDNYXA	New York	NYCQNYCO	New York	OWSCNYOO	New York
NWWNNYNW	New York	NYCQNYFH	New York	OXFRNYXA	New York
NYACNYNK	New York	NYCQNYFL	New York	OYBANYOY	New York
NYCKNY14	New York	NYCQNYFR	New York	PANMNYXA	New York
NYCKNY71	New York	NYCQNYHS	New York	PASNNYPN	New York
NYCKNY77	New York	NYCQNYIA	New York	PCHGNYPH	New York
NYCKNYAI	New York	NYCQNYJA	New York	PERUNYPE	New York
NYCKNYAL	New York	NYCQNYLI	New York	PGHKNYSH	New York
NYCKNYAR	New York	NYCQNYLN	New York	PGHKNYSP	New York
NYCKNYAU	New York	NYCQNYNJ	New York	PHLANYPF	New York
NYCKNYAY	New York	NYCQNYNW	New York	PHLSNYXA	New York
NYCKNYBR	New York	NYCQNYOP	New York	PHMTNYPM	New York
NYCKNYBU	New York	NYCQNYRH	New York	PHNCNYPH	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
PHNXNYXA	New York	ROCHNYXD	New York	SLSPNYXA	New York
PJSTNYPJ	New York	ROCHNYXE	New York	SLTSNYSL	New York
PKSKNYPS	New York	ROCHNYXF	New York	SMFRNYQM	New York
PLBGNYPB	New York	ROCHNYXG	New York	SMMTNYXA	New York
PLMYNYPY	New York	ROCHNYXH	New York	SMTWNYSM	New York
PLSKNYXA	New York	ROCHNYXJ	New York	SNBRNYXA	New York
PLVLNYPL	New York	ROCHNYXK	New York	SNCKNYXA	New York
PLVWNYPV	New York	RODLNYRD	New York	SNCVNYXA	New York
PNBSNYXA	New York	ROMENYRM	New York	SNFLNYSL	New York
PNFDNYXA	New York	ROSCNYXA	New York	SODSNYSD	New York
PNISNYXA	New York	RPLYNYXA	New York	SPNCNYXA	New York
PNPLNYXA	New York	RSLNNYRO	New York	SPPTNYXA	New York
PNYNNYPN	New York	RSPNNYXA	New York	SPVLNYWM	New York
POMNNYPO	New York	RSVLNYRV	New York	SPVYNYSV	New York
PPRGNYPP	New York	RTJTNYXA	New York	SPWRNYXA	New York
PRDYNYPD	New York	RUVLNYXA	New York	SRLKNYQL	New York
PRISNYPA	New York	RVHDNYRV	New York	SRNCNYQC	New York
PRRVNYNP	New York	RXBYNYRX	New York	SRSPNYSR	New York
PRTVNYPV	New York	RYE NYRY	New York	SSCHNYSO	New York
PRVINYPR	New York	SALMNYSM	New York	SSLMNYSS	New York
PSVLNYPV	New York	SATNNYSN	New York	STATNYXA	New York
PTBYNYXA	New York	SAVNNYSN	New York	STBGNYXA	New York
PTCHNYPC	New York	SBTHNYSB	New York	STJNNYXA	New York
PTHNNYPO	New York	SCDLNYSR	New York	STKTNYSK	New York
PTJRNYXA	New York	SCHNNYSC	New York	STMNNYXA	New York
PTSDNYPs	New York	SCHRNYQH	New York	STNLNYXA	New York
PTTWNYPI	New York	SCHVNYQN	New York	STNVNYST	New York
PTVYNYPY	New York	SCTWNYXA	New York	STTWNYXA	New York
PTWANYPW	New York	SCVLNYXA	New York	SVNHNYXA	New York
PVLNNYXA	New York	SDNYNYXB	New York	SYBHNYQY	New York
PVYDNYPD	New York	SFRNNYSU	New York	SYOSNYSY	New York
PWNGNYSS	New York	SGHRNYSG	New York	SYRCNYDD	New York
RAVNNYXA	New York	SGRTNYSG	New York	SYRCNYEP	New York
RCSPNYRS	New York	SHHMNYSH	New York	SYRCNYGS	New York
RCVLNYRH	New York	SHKNNYSK	New York	SYRCNYJS	New York
RDHKNYXB	New York	SHMNNYXA	New York	SYRCNYSA	New York
REMSNYXA	New York	SHRVNYXA	New York	SYRCNYSU	New York
RHNBNYXA	New York	SHVLNYSV	New York	SYVLNYSA	New York
RNDHNYXA	New York	SKNTNYSE	New York	THRSNYTH	New York
RNKNNYRN	New York	SLCKNYSI	New York	TIVONYXA	New York
RNLKNYRL	New York	SLDNNYSE	New York	TKHONYTU	New York
ROCHNYXB	New York	SLHLNYXA	New York	TLLYNYTY	New York
ROCHNYXC	New York	SLMNNYWW	New York	TMBGNYXA	New York

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
TNVLYNTN	New York	WLTWNYXA	New York
TNWNNYTW	New York	WLVLNYNM	New York
TRHLNYXA	New York	WMSNNYWN	New York
TROINY03	New York	WNDLNYWD	New York
TROINY04	New York	WNDSNYXA	New York
TRTWNYTT	New York	WNHMNYWM	New York
TUXDNYTX	New York	WNKHNYWK	New York
TXTNNYXA	New York	WNTGNYWT	New York
UNADNYXA	New York	WNTHNYXA	New York
UNSPNYUS	New York	WPFLNYWF	New York
UTICNYUT	New York	WRBGNYWU	New York
UVLONYXF	New York	WRBONYXA	New York
VCTRNYXA	New York	WRCSNYUC	New York
VERNNYXA	New York	WRSWNYXA	New York
VLFLNYVF	New York	WRWKNYXA	New York
VRBGNYVB	New York	WSFDNYXA	New York
VRGLNYXA	New York	WSHVNYXA	New York
VRHVNYVR	New York	WSNCNYUN	New York
WAYNNYXA	New York	WSPTNYXA	New York
WBSTNYXA	New York	WSVLNYNC	New York
WBSTNYXB	New York	WSVYNYXA	New York
WBYNNYWE	New York	WTGLNYWG	New York
WCHZNYXA	New York	WTPTNYWR	New York
WDMRNYFR	New York	WTRLNYWT	New York
WDPTNYWT	New York	WTTWNYUN	New York
WDSTNYWS	New York	WTVLNYXA	New York
WERLNYWL	New York	WVRLNYWV	New York
WHBHNYWB	New York	WWVLNYWW	New York
WHBONYWP	New York	WYLDNYXA	New York
WHLKNYWH	New York	YNKRNYYN	New York
WHPLNYWP	New York	YNTWNYYT	New York
WHPNNYXA	New York	YPHNNYYA	New York
WHTHNYUH	New York		
WHVRNYWH	New York		
WLBNNYXA	New York		
WLBONYUB	New York		
WLCTNYWC	New York		
WLDNNYXC	New York		
WLKLNYXA	New York		
WLMGNYXA	New York		
WLSNNYME	New York		
WLTNNYXA	New York		

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
YRTWNYT	Tennessee	CLTNTNMA	Tennessee	GDVLTNMA	Tennessee
ACHLTNMT	Tennessee	CLVLTNMA	Tennessee	GNBOTNXA	Tennessee
ADVLTNXA	Tennessee	CMDNTNMA	Tennessee	GNBRTNMA	Tennessee
ALAMTNXA	Tennessee	CNCRTNXA	Tennessee	GRNBTNMA	Tennessee
ALGDTNXA	Tennessee	CNHMTNMA	Tennessee	GRVLTNXA	Tennessee
APSNTNXA	Tennessee	CNVLTNMA	Tennessee	GTBGTNMT	Tennessee
ARTNTNMT	Tennessee	COVLTNXA	Tennessee	GTWSTNSW	Tennessee
ASCYTNMA	Tennessee	CPHLTNXA	Tennessee	HCRDTNXA	Tennessee
ATHNTNMA	Tennessee	CRHLTNCB	Tennessee	HDVLTNMA	Tennessee
ATWDTNXA	Tennessee	CRPLTNMA	Tennessee	HIMNTNMA	Tennessee
BCGVTNXA	Tennessee	CRTHTNMA	Tennessee	HLBOTNXA	Tennessee
BCTNTNXA	Tennessee	CRVLTNMA	Tennessee	HLLSTNMT	Tennessee
BLCYTNXA	Tennessee	CSVLTNXA	Tennessee	HMBLTNMA	Tennessee
BLGPTNMA	Tennessee	CULKTNMA	Tennessee	HMPNTNXA	Tennessee
BLLSTNMA	Tennessee	CVTNTNMT	Tennessee	HNNGTNMA	Tennessee
BLNCTNMT	Tennessee	CXTNTNXA	Tennessee	HNSNTNMT	Tennessee
BLPLTNXA	Tennessee	DCTRNTMT	Tennessee	HNTGTNMA	Tennessee
BLTNTNXA	Tennessee	DKSNTNMT	Tennessee	HNVTNXA	Tennessee
BNTNTNMT	Tennessee	DNLPTNXA	Tennessee	HRNBTNMT	Tennessee
BRFRTNXA	Tennessee	DNRGTNMA	Tennessee	HTVLTNMA	Tennessee
BRSHTNXA	Tennessee	DOVRTNMT	Tennessee	JCSNTNMA	Tennessee
BRSTTNXA	Tennessee	DRMNTNXA	Tennessee	JCSNTNNS	Tennessee
BRSTTNXB	Tennessee	DRSDTNXA	Tennessee	JFCYTNMA	Tennessee
BRZLTNXA	Tennessee	DYBGTNMA	Tennessee	JHCYTNXC	Tennessee
BTLRTNXA	Tennessee	DYERTNMT	Tennessee	JLLCTNMA	Tennessee
BUVLTNXA	Tennessee	DYTNTNMA	Tennessee	JNBOTNXA	Tennessee
BWVLTNMA	Tennessee	EAVLTNMA	Tennessee	JSPRTNMT	Tennessee
CHHLTNXA	Tennessee	ELTNTNXA	Tennessee	KGPTTNXA	Tennessee
CHRLTNMT	Tennessee	ENWDTNXA	Tennessee	KGPTTNXC	Tennessee
CHTGTNBR	Tennessee	ERWNTNXA	Tennessee	KGTNTNMT	Tennessee
CHTGTNDT	Tennessee	ESSPTNXA	Tennessee	KNTNTNMA	Tennessee
CHTGTNHT	Tennessee	ETWHTNMT	Tennessee	KNVLTNBE	Tennessee
CHTGTNMV	Tennessee	FIVLTNMA	Tennessee	KNVLTNFC	Tennessee
CHTGTNNS	Tennessee	FKLNTNCC	Tennessee	KNVLTNMA	Tennessee
CHTGTNRB	Tennessee	FKLNTNMA	Tennessee	KNVLTNWH	Tennessee
CHTGTNSE	Tennessee	FLBRTNXA	Tennessee	KNVLTNYH	Tennessee
CHTGTNSM	Tennessee	FLVLTNMA	Tennessee	LBNNTNMA	Tennessee
CHTNTNMT	Tennessee	FRDNTNMA	Tennessee	LBVLTNXA	Tennessee
CKVLTNXA	Tennessee	FRSHTNXA	Tennessee	LFLTNTMA	Tennessee
CLDGTNMA	Tennessee	FRVWTNMT	Tennessee	LFYTTNXA	Tennessee
CLDLTNXA	Tennessee	FYVLTNMA	Tennessee	LKCYTNMA	Tennessee
CLEVTNMA	Tennessee	GALLTNMA	Tennessee	LMSTTNXA	Tennessee
CLMATNMA	Tennessee	GBSNTNMT	Tennessee	LNCYTNMA	Tennessee

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
LODNTNMA	Tennessee	MTJLTNXA	Tennessee	RDGLTNMA	Tennessee
LTHMTNXA	Tennessee	MTRYTNXA	Tennessee	RKWDTNMA	Tennessee
LVRGTNXA	Tennessee	MYVLTNMA	Tennessee	RNMTTNXA	Tennessee
LWBGTNMA	Tennessee	NIOTTNXA	Tennessee	RPLYTNMA	Tennessee
LXTNTNMA	Tennessee	NLVLTNXA	Tennessee	RRVLTNMA	Tennessee
LYBGTNMT	Tennessee	NRRSTNMA	Tennessee	RSMRTNXA	Tennessee
LYLSTNMA	Tennessee	NSVLTNAP	Tennessee	RTLGTNXA	Tennessee
LYVLTNMA	Tennessee	NSVLTNBH	Tennessee	SANGTNMT	Tennessee
MARTTNXA	Tennessee	NSVLTNBV	Tennessee	SDDSTNMA	Tennessee
MASNTNXA	Tennessee	NSVLTNBW	Tennessee	SEWNTNMW	Tennessee
MAVLTNMA	Tennessee	NSVLTNCD	Tennessee	SHFRTNXA	Tennessee
MCBGTNXA	Tennessee	NSVLTNCH	Tennessee	SHRNTNXA	Tennessee
MCWNTNMT	Tennessee	NSVLTNDO	Tennessee	SHVLTNMA	Tennessee
MDVITNMT	Tennessee	NSVLTNHH	Tennessee	SHVYTNXA	Tennessee
MDWYTNXA	Tennessee	NSVLTNIN	Tennessee	SIDNTNXA	Tennessee
MEDNTNMA	Tennessee	NSVLTNMC	Tennessee	SLGRTNXA	Tennessee
MGTNTNXA	Tennessee	NSVLTNMT	Tennessee	SLMRTNMT	Tennessee
MILNTNMA	Tennessee	NSVLTNST	Tennessee	SMVLTNXA	Tennessee
MMPHTNBA	Tennessee	NSVLTNUN	Tennessee	SMYRTNMA	Tennessee
MMPHTNCK	Tennessee	NSVLTNWC	Tennessee	SNTFTNMA	Tennessee
MMPHTNCT	Tennessee	NSVLTNWM	Tennessee	SNTNTNXA	Tennessee
MMPHTNEL	Tennessee	NWBRTNMA	Tennessee	SNVLTNMA	Tennessee
MMPHTNFR	Tennessee	NWJHTNXA	Tennessee	SOVLTNMT	Tennessee
MMPHTNGT	Tennessee	NWPTTNMT	Tennessee	SPBGTNMA	Tennessee
MMPHTNHP	Tennessee	NWTZTNXA	Tennessee	SPCYTNMT	Tennessee
MMPHTNMA	Tennessee	OKDLTNXA	Tennessee	SPFDTNMA	Tennessee
MMPHTNMT	Tennessee	OKRGTNMT	Tennessee	SPHLTNMT	Tennessee
MMPHTNOA	Tennessee	OLHCTNMA	Tennessee	SPRTTNXA	Tennessee
MMPHTNST	Tennessee	OLSPTNMA	Tennessee	SRVLTNMA	Tennessee
MMRLTNXA	Tennessee	OLTWTNXA	Tennessee	STCKTNXA	Tennessee
MMVLTNXA	Tennessee	OLZITNXA	Tennessee	SVVLTNMT	Tennessee
MNCHTNMA	Tennessee	ONEDTNXA	Tennessee	SWTWTNMT	Tennessee
MNFDTNXA	Tennessee	PLHLTNXA	Tennessee	TANSTNXA	Tennessee
MNPLTNMA	Tennessee	PLHMTNXA	Tennessee	TLLHTNMA	Tennessee
MOSHTNXA	Tennessee	PLMYTNMA	Tennessee	TLPLTNXA	Tennessee
MRBOTNMA	Tennessee	PLSKTNMA	Tennessee	TPVLTNMA	Tennessee
MRCYTNXA	Tennessee	POWLTNXA	Tennessee	TRCYTNXA	Tennessee
MRTWTNMA	Tennessee	PRSSTNXA	Tennessee	TRINTNMA	Tennessee
MSCTTNMT	Tennessee	PRYRTNXA	Tennessee	TRMBTNXA	Tennessee
MSCWTNMA	Tennessee	PSVWTNMT	Tennessee	TROYTNMT	Tennessee
MSHLTNXA	Tennessee	PTLDTNMA	Tennessee	TRTNTNMA	Tennessee
MTCYTNXA	Tennessee	PTRSTNXA	Tennessee	TTSPTNXA	Tennessee
MTEGTNXA	Tennessee	RCVLTNXA	Tennessee	TWNSTNMA	Tennessee

<u>WC Code</u>	<u>State</u>
UNCYTNMA	Tennessee
UNVLTNXA	Tennessee
VIOLTNXA	Tennessee
VONRTNXA	Tennessee
WHBLTNMT	Tennessee
WHHSTNMA	Tennessee
WHPITNMA	Tennessee
WHVLTNMT	Tennessee
WHWLTNMA	Tennessee
WLPTTNMA	Tennessee
WNCHTNMA	Tennessee
WRTRTNMT	Tennessee
WSBNTNXA	Tennessee
WTTWTNMA	Tennessee
WVRLTNMT	Tennessee
YRVLTNXA	Tennessee

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
ABNGVAXA	Virgina	CLHGVACO	Virgina	GRFLVAGF	Virgina
ALBRVAXA	Virgina	CLMTVAXA	Virgina	GTCYVAXA	Virgina
ALXNVAAD	Virgina	CLPPVACU	Virgina	GVTNVAGR	Virgina
ALXNVAAX	Virgina	CLPPVAGR	Virgina	HAYSVAXA	Virgina
ALXNVABA	Virgina	CLPPVALI	Virgina	HCKRVAXA	Virgina
ALXNVABR	Virgina	CLPPVARV	Virgina	HLBOVAHB	Virgina
ALXNVACN	Virgina	CMLDVACU	Virgina	HLLDVAXA	Virgina
ALXNVAFR	Virgina	CNCTVACT	Virgina	HMPNVAAB	Virgina
ALXNVAMV	Virgina	CNVIVACT	Virgina	HMPNVADC	Virgina
AMELVAXA	Virgina	CPCHVACC	Virgina	HMPNVAQN	Virgina
ARCLVAXA	Virgina	CPRNVAXA	Virgina	HMPNVAWD	Virgina
ARTNVAAR	Virgina	CREWVAXA	Virgina	HMSYVAXA	Virgina
ARTNVACK	Virgina	CRLDVAXA	Virgina	HNVRVAXA	Virgina
ARTNVACY	Virgina	CRTDVAXA	Virgina	HPWLVAHW	Virgina
ARTNVAFC	Virgina	DAWNVAXA	Virgina	HRNDVADU	Virgina
ASBNVAAS	Virgina	DHLGVAXA	Virgina	HRNDVAHE	Virgina
ASLDVAAS	Virgina	DLCYVAXA	Virgina	HRNDVAST	Virgina
BCKNVABC	Virgina	DLLSVAXA	Virgina	HRWDVAHW	Virgina
BCRGVAXA	Virgina	DMSCVAXA	Virgina	HYMRVAXA	Virgina
BCWDVAXA	Virgina	DNWDVADW	Virgina	INHVLVAXA	Virgina
BEVLVABV	Virgina	DRVRVADR	Virgina	IVORVAXA	Virgina
BKBGVABB	Virgina	DSPAVAXA	Virgina	IVTNVAXA	Virgina
BLCSVAXA	Virgina	DSWLVAXA	Virgina	JRRTVAXA	Virgina
BLMTVABM	Virgina	DTVLVAXA	Virgina	KGGRVAXA	Virgina
BOYCVABY	Virgina	EMPRVAXA	Virgina	KGQNVAXA	Virgina
BRDNVAXA	Virgina	EPFKVAXA	Virgina	KGWLVAXA	Virgina
BRSTVAXA	Virgina	ETVLVAEV	Virgina	KNBRVAXA	Virgina
BRVLVAXA	Virgina	EXMRVAEX	Virgina	LACRVAXA	Virgina
BTHIVABT	Virgina	FIFEVAFI	Virgina	LBNNVARD	Virgina
BVRDVAXA	Virgina	FKLNVA XB	Virgina	LDYSVAXA	Virgina
BWLGVAXA	Virgina	FLCHVAMF	Virgina	LOUSVALU	Virgina
BYTNVAXA	Virgina	FRBGVAFB	Virgina	LRTNVAGU	Virgina
CALVVACA	Virgina	FRBGVALH	Virgina	LRTNVAXA	Virgina
CHCYVACC	Virgina	FRFXVABF	Virgina	LRVLVAXA	Virgina
CHESVACR	Virgina	FRFXVAFF	Virgina	LSBGVALB	Virgina
CHKTVAXA	Virgina	FRVLVAXA	Virgina	LVVLVALV	Virgina
CHLHVAXA	Virgina	GCLDVAGO	Virgina	MARNVAXA	Virgina
CHNCVAXA	Virgina	GDSPVAXA	Virgina	MCHVVAMV	Virgina
CHNCVAXB	Virgina	GLCSVAXA	Virgina	MCKYVAMK	Virgina
CHSKVACD	Virgina	GMTRVAXA	Virgina	MCLNVALV	Virgina
CHSKVADC	Virgina	GOVLVAGV	Virgina	MDBGVAMI	Virgina
CHSKVAGU	Virgina	GRBRVAXA	Virgina	MDLTVAMD	Virgina
CLBHVAXA	Virgina	GRBRVAXB	Virgina	MDVWVAXA	Virgina

<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>	<u>WC Code</u>	<u>State</u>
MNKNVAMN	Virgina	RCMDVAHR	Virgina	VRBHVASR	Virgina
MNRLVAML	Virgina	RCMDVAHS	Virgina	VRBHVAVB	Virgina
MNSSVAXA	Virgina	RCMDVAIT	Virgina	WHOKVAWO	Virgina
MNTRVAXA	Virgina	RCMDVALS	Virgina	WHVLVAWH	Virgina
MRSHVAMA	Virgina	RCMDVAPE	Virgina	WKFDVAXA	Virgina
MTHWVAXA	Virgina	RCMDVAPS	Virgina	WLBGVAWM	Virgina
MTPLVAXA	Virgina	RCMDVARA	Virgina	WLMLVAXA	Virgina
NKVLVAXA	Virgina	RCMDVASN	Virgina	WNDSVAXA	Virgina
NRFLVABL	Virgina	RCMDVASR	Virgina	WRSWVAXA	Virgina
NRFLVABS	Virgina	RCMDVATC	Virgina	WRTNVAWR	Virgina
NRFLVAGS	Virgina	RKVLVARK	Virgina	WSPNVAWP	Virgina
NRFLVAOD	Virgina	RMTNVARE	Virgina	WTFRVAWT	Virgina
NRFLVAOV	Virgina	RSHLVALE	Virgina	WVRLVAWV	Virgina
NRFLVASP	Virgina	RSTNVAFM	Virgina		
NRFLVAWC	Virgina	SALDVAXA	Virgina		
NWNWVAHU	Virgina	SBWKVAXA	Virgina		
NWNWVAHV	Virgina	SFFLVASK	Virgina		
NWNWVAJF	Virgina	SLVLVAXA	Virgina		
NWNWVAND	Virgina	SMFDVAXA	Virgina		
NWNWVAYK	Virgina	SNTNVASS	Virgina		
OCQNVAXA	Virgina	SPFDVASP	Virgina		
OLCHVAXA	Virgina	SPTSVASP	Virgina		
ONNCVAON	Virgina	SRRYVAXA	Virgina		
PCVLVAPV	Virgina	SRVLVASP	Virgina		
PRANVAXA	Virgina	STCKVAXA	Virgina		
PRANVAXB	Virgina	STFRVAXA	Virgina		
PRFRVAPF	Virgina	STHLVAXA	Virgina		
PRKSVAPK	Virgina	THPLVATP	Virgina		
PRSPVAXA	Virgina	TMVLVATV	Virgina		
PTBGVACD	Virgina	TOANVATO	Virgina		
PTBGVAPB	Virgina	TPHNVAXA	Virgina		
PTMOVAHF	Virgina	TRNGVAXA	Virgina		
PTMOVAHS	Virgina	UNVLVAUV	Virgina		
PTRYVAXA	Virgina	UPVLVAUP	Virgina		
PUNGVAXA	Virgina	VARNVAVR	Virgina		
PWHTVAPW	Virgina	VINNVAVN	Virgina		
QNTCVAXA	Virgina	VRBHVACC	Virgina		
QNTNVAQN	Virgina	VRBHVACT	Virgina		
RCMDVACG	Virgina	VRBHVAGN	Virgina		
RCMDVAGK	Virgina	VRBHVAIL	Virgina		
RCMDVAGR	Virgina	VRBHVAIR	Virgina		
RCMDVAGY	Virgina	VRBHVAPT	Virgina		
RCMDVAHL	Virgina	VRBHVARC	Virgina		

State	CLLI	EXCHANGE	COMPANY
Maine	AGSTMESTDS0	AUGUSTA	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ASLDMEMARS1	ASHLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BATHMEHIDS0	BATH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BCPTMECERS1	BUCKSPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BDFRMEJEDS0	BIDDEFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BLFSMEWARS1	BELFAST	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BLGRMEMARS1	BELGRADE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BLHLMEMPLRS1	BLUE HILL	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BNGRMEPADS0	BANGOR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BNHMMEMERS1	BINGHAM	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BREWMECHRS1	BANGOR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BRFRMEYARS1	BRADFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BRTNMEFIRS1	BRIDGTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BRWKMEEVDS0	BRUNSWICK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BTHRMEEARS1	BOOTHBAHBR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BWHMMEMARS1	BOWDOINHAM	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	BWVLMEBPRS1	BROWNVILLE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CALSMECHRS1	CALAIS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CARBMEHIRS1	CARIBOU	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CASTMECORS1	CASTINE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CLMAMEEPRS1	COLUMBIA	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CLTNMEMLRS1	CLINTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CMDNMEELRS1	CAMDEN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CMLDMEMARS1	CUMBERLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CRNSMEMARS1	CORNISH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CRNTMEMARS1	CORINTH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	CTLRMEYARS1	MACHIAS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DEISMEYARS1	DEER ISLE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DNFTMECARS1	DANFORTH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DNFTMECARS1	WYTOPITLK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DOVRNHTH748	ELIOT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DRHRMEWERS1	DARKHARBOR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DVFXMEMARS1	DOVERFCRFT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DXFDMEKIRS1	DIXFIELD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	DXTRMEMARS1	DEXTER	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	EDTNMEEERS1	EDDINGTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ELWOMEMADS0	ELLSWORTH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	EMLNMEBIRS1	EMILLINCKT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ERRLNHYARS1	WILSONS ML	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ESPTMESTRS1	EASTPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ESTNMEMARS1	EASTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	FCVLMESARS1	FRENCHVL	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	FKLNMEMARS1	FRANKLIN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	FLMOMEDERS1	PORTLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	FRFDMELARS1	FAIRFIELD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	FRPTMECURS1	FREEPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM

State	CLLI	EXCHANGE	COMPANY
Maine	FRTNMEHIRS1	FARMINGTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	FTFRMEFHRS1	FT FAIRFLD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GDISMEMORS1	GRAND ISLE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GDMLMEDHRS1	GOODWINSML	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GNVLMEWERS1	GREENVILLE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GRHMMECHRS1	GORHAM	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GRNRMEBRRS1	GARDINER	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GRTWMEYARS1	BATH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	GUFDMEHIRS1	GUILFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	HERMMEBIRS1	HERMON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	HLTNMECORS1	HOULTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	HRSNMEYARS1	HARRISON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	HRWLMEYARS1	HARPSWELL	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	JCMNMEMARS1	JACKMAN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	JNPTMEMTRS1	JONESPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	KNBNMEGRRS1	KENNEBUNK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	KNPTMESCRS1	KENNEBNKPT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LMRCMEBSRS1	LIMERICK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LMSTMEMARS1	LIMESTONE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LMSTMHEYARS1	LIMESTONE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LNCLMEWBRs1	LINCOLN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LSFLMEADRS1	LISBON FLS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LSTNMEASDS0	LEWISTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LTTNMEYARS1	HOULTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LUBCMEMARS1	LUBEC	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	LVFLMEUNRS1	LIVERMRFLS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MCFLMEPLRS1	MECHANCFLS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MCHSMECBRS1	MACHIAS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MDSNMEMARS1	MADISON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MDWSMEMARS1	MADAWASKA	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MILOMEELRS1	MILO	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MLBRMEYARS1	MILBRIDGE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MLNCMEPERS1	MILLINOCKT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MLTNNHSI658	W LEBANON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MNSNMEBLRS1	MONSON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MONRMEBERS1	MONROE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MRHLMYORS1	MARS HILL	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	MTMLNHWE477	ACTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NBRWMEWERS1	NO BERWICK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NDRGMEAUDS0	PORTLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NHRBMENHRS1	NORTHETHBR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NHVNMEHRS1	VINALHAVEN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NRWFMECMRS1	NOWHITEFLD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NRWYMEFARS1	NORWAY	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NSFRMESPRS1	SANFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	NWPTMEMARS1	NEWPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM

State	CLLI	EXCHANGE	COMPANY
Maine	NWSWMEWERS1	NEW SWEDEN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	OKLDMEWGRS1	OAKLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	OLTWMEBCRS1	OLD TOWN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	OOBHMEPORS1	OLDORCHBCH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ORONMEFORS1	ORONO	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ORTNMECORS1	ORRINGTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	OXFRMEHIRS1	OXFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PHBGMESPRS1	BATH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PKISMEISRS1	PORTLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PMBRMEYARS1	PEMBROKE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PRISMESEDS0	PRESQUE IS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PRTNMEMCRS1	PRINCETON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PRTNMEMCRS1	VANCEBORO	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PTFDMEEARS1	PITTSFIELD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PTLDMEFODS0	PORTLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PTMONHISDS1	KITTERY	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	PWNLMEELRS1	POWNAI	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	RCMDMESORS1	RICHMOND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	RDFDMEWIRS1	READFIELD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	RKLDMELIDS0	ROCKLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	RKWDMEYARS1	ROCKWOOD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	RMFRMEHERS1	RUMFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	RNGLMEPLRS1	RANGELEY	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	ROCHNHWEDS2	SO LEBANON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SBTSMEMPRS1	SABATTUS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SBWKMEJERS1	SO BERWICK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SCBOMEBPRS1	SCARBOROUGH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SDWKMEYARS1	SEDGWICK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SGTNMEYARS1	DEER ISLE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SKWHMENORS1	SKOWHEGAN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SLLVMEYARS1	SULLIVAN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SMRSNHHIRS2	BERWICK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SNFRMECHDS0	LEBANON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SNFRMECHDS0	SANFORD	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SPLDMEESDS0	ORONO	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SPLDMEESDS0	PORTLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SRPTMEPRRS1	SEARSPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SWHRMEMARS1	SOUTHWEHBR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	THFRMEBJRS1	THE FORKS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	THMTMEGLRS1	THOMASTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	TNHRMEHSRS1	TENANTSHBR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	VNBRMESJRS1	VAN BUREN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	VNHNMENHRS1	VINALHAVEN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WDLDMEHORS1	WOODLAND	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WLBOMEMARS1	WALDOBORO	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WLLSMEYARS1	WELLS	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM

State	CLLI	EXCHANGE	COMPANY
Maine	WLLSMEYARS2	YORK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WLTOMERCRS1	WILTON	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WNHMMEGRRS1	WINDHAM	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WNHRMENERS1	WINTER HBR	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WNPTMEOARS1	WINTERPORT	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WSBKMEASRS1	WESTBROOK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WSBNMEMARS1	WASHBURN	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WSCSMEWARS1	WISCASSET	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	WTVLMEAPDS0	WATERVILLE	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	YORKMELSR1	YORK	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	YRMOMESORS1	YARMOUTH	NO NEW ENGLAND TEL OP DBA FAIRPOINT COMM
Maine	SCHNMEXADS0	CHINA	CHINA TELEPHONE CO.
Maine	SCHNMEXADS0	E VASSALBO	CHINA TELEPHONE CO.
Maine	SCHNMEXADS0	SOUTHCHINA	CHINA TELEPHONE CO.
Maine	RXPDMEXARS0	ROXBURYPND	CO. OXFORD WEST TELEPHONE COMPANY
Maine	WGRDMEXADS0	W GARDINER	COBBOSSEECONTEE TELEPHONE COMPANY
Maine	EWNTMEXARS1	WINTHROP	COMMUNITY SERVICE TELEPHONE CO.
Maine	GRNEMEXARS1	GREENE	COMMUNITY SERVICE TELEPHONE CO.
Maine	LEDSMEXARS1	LEEDS	COMMUNITY SERVICE TELEPHONE CO.
Maine	LTFDMEXARS1	LITCHFIELD	COMMUNITY SERVICE TELEPHONE CO.
Maine	MNMOMEXADS0	MONMOUTH	COMMUNITY SERVICE TELEPHONE CO.
Maine	MTVRMEXARS1	MT VERNON	COMMUNITY SERVICE TELEPHONE CO.
Maine	WNTHMEXADS0	WINTHROP	COMMUNITY SERVICE TELEPHONE CO.
Maine	ETNAMEXARS1	ETNA	HAMPDEN TELEPHONE CO.
Maine	HMPDMEXARS0	HAMPDEN	HAMPDEN TELEPHONE CO.
Maine	HRLDMEXADS0	HARTLAND	HARTLAND & ST. ALBANS TELEPHONE CO.
Maine	HRMYMEXARS1	HARMONY	HARTLAND & ST. ALBANS TELEPHONE CO.
Maine	WRPLMEXARS1	WESTRIPLEY	HARTLAND & ST. ALBANS TELEPHONE CO.
Maine	FHBRMEXARS1	FRENCHBORO	ISLAND TELEPHONE CO.
Maine	ISHTMEXARS1	ISLEAUHAUT	ISLAND TELEPHONE CO.
Maine	MTNCMEXARS1	MATINICUS	ISLAND TELEPHONE CO.
Maine	SWISMEXADS0	SWANS IS	ISLAND TELEPHONE CO.
Maine	LNBMEXARS1	LINCOVLBCH	LINCOLNVILLE TELEPHONE CO.
Maine	LNVLMEADS0	LINCOLNVL	LINCOLNVILLE TELEPHONE CO.
Maine	STNDMEXADS0	CASCO	MAINE TELEPHONE COMPANY
Maine	STNDMEXADS0	NAPLES	MAINE TELEPHONE COMPANY
Maine	STNDMEXADS0	POLAND	MAINE TELEPHONE COMPANY
Maine	STNDMEXADS0	RAYMOND	MAINE TELEPHONE COMPANY
Maine	ALTNMEXARS1	ALTON	MID-MAINE TELECOM, LLC
Maine	LVNTMEXADS0	LEVANT	MID-MAINE TELECOM, LLC
Maine	OLTWMEARS1	OLDTOWN RL	MID-MAINE TELECOM, LLC
Maine	PLMOMEXARS1	PLYMOUTH	MID-MAINE TELECOM, LLC
Maine	WEFDMEXADS0	W ENFIELD	MID-MAINE TELECOM, LLC
Maine	FRBGMEXADS0	LOVELL	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	FRBGMEXADS0	NO LOVELL	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	FRBGMEXADS0	NOFRYEBURG	NORTHLAND TELEPHONE OF MAINE, INC.

State	CLLI	EXCHANGE	COMPANY
Maine	FRBGMEXADS2	FRYEBURG	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	FTKNMEXADS1	EAGLE LAKE	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	FTKNMEXADS1	FORT KENT	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	FTKNMEXADS1	ST FRANCIS	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	LBRTMEXADS0	BROOKS	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	LBRTMEXADS0	LIBERTY	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	LBRTMEXADS0	MORRILL	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	LBRTMEXADS0	PALERMO	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	LBRTMEXADS0	WASHINGTON	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS0	ISLAND FLS	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS0	PATTEN	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS0	SHERMAN ML	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS0	SMYRNA ML	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS1	KINGMAN	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS1	LEE	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	SHMLMEXADS1	MATTAWMKEG	NORTHLAND TELEPHONE OF MAINE, INC.
Maine	BCFDMEXADS0	BUCKFIELD	OXFORD COUNTY TELEPHONE & TELEGRAPH CO.
Maine	CNTNMEXADS0	CANTON	OXFORD COUNTY TELEPHONE & TELEGRAPH CO.
Maine	NTRNMEXADS0	TURNER	OXFORD COUNTY TELEPHONE & TELEGRAPH CO.
Maine	SMNRMEXADS0	SUMNER	OXFORD COUNTY TELEPHONE & TELEGRAPH CO.
Maine	TRNRMEXADS0	TURNER	OXFORD COUNTY TELEPHONE & TELEGRAPH CO.
Maine	WPRSMEXADS0	WEST PARIS	OXFORD COUNTY TELEPHONE & TELEGRAPH CO.
Maine	ANDVMEXARS1	ANDOVER	OXFORD WEST TELEPHONE COMPANY
Maine	BETHMEXADS0	BETHEL	OXFORD WEST TELEPHONE COMPANY
Maine	BRPNMEXBDS0	BRYANTPOND	OXFORD WEST TELEPHONE COMPANY
Maine	HBRNMEXADS0	HEBRON	OXFORD WEST TELEPHONE COMPANY
Maine	LCMLMEXARS1	LOCKEMILLS	OXFORD WEST TELEPHONE COMPANY
Maine	NNWYMEXARS1	NO NORWAY	OXFORD WEST TELEPHONE COMPANY
Maine	UPTNMEXA533	UPTON	OXFORD WEST TELEPHONE COMPANY
Maine	WBTHMEXARS1	WESTBETHEL	OXFORD WEST TELEPHONE COMPANY
Maine	GRAYMEXAO1T	GRAY	PINE TREE TELEPHONE LLC
Maine	NWGLMEXADS0	NEWGLOCSTR	PINE TREE TELEPHONE LLC
Maine	WGRYMEXADS0	WEST GRAY	PINE TREE TELEPHONE LLC
Maine	BRMLMEXA02T	BAR MILLS	SACO RIVER TELEPHONE LLC
Maine	WRBOMEXARS1	WATERBORO	SACO RIVER TELEPHONE LLC
Maine	SDNYMEXARS2	SIDNEY	SIDNEY TELEPHONE CO.
Maine	ATHNMEXARS1	ATHENS	SOMERSET TELEPHONE CO.
Maine	BGLWMEXARS0	BIGELOW	SOMERSET TELEPHONE CO.
Maine	CBGRMEXADS0	COBURNGORE	SOMERSET TELEPHONE CO.
Maine	CRBSMEXARS1	CARRABSSTT	SOMERSET TELEPHONE CO.
Maine	EMLKMEXARS1	EMBDENLAKE	SOMERSET TELEPHONE CO.
Maine	KGFDMEARS1	KINGFIELD	SOMERSET TELEPHONE CO.
Maine	MRCRMEXARS2	MERCER	SOMERSET TELEPHONE CO.
Maine	NANSMEXADS1	NORTHANSON	SOMERSET TELEPHONE CO.
Maine	NNPRMEXARS1	NNEWPORTLD	SOMERSET TELEPHONE CO.
Maine	NRDGMEXADS0	NORRIDGWCK	SOMERSET TELEPHONE CO.

State	CLLI	EXCHANGE	COMPANY
Maine	NWVNMEXARS1	NEWVINYARD	SOMERSET TELEPHONE CO.
Maine	PHLPMEXARS1	PHILLIPS	SOMERSET TELEPHONE CO.
Maine	ROMEMEXARS1	ROME	SOMERSET TELEPHONE CO.
Maine	SALMMEXARS2	SALEM	SOMERSET TELEPHONE CO.
Maine	SMFDMEXARS1	SMITHFIELD	SOMERSET TELEPHONE CO.
Maine	SOLNMEXARS1	SOLON	SOMERSET TELEPHONE CO.
Maine	SRTNMEXARS1	MOOSEHORN	SOMERSET TELEPHONE CO.
Maine	SRTNMEXARS1	STRATTON	SOMERSET TELEPHONE CO.
Maine	STRNMEXADS0	STRONG	SOMERSET TELEPHONE CO.
Maine	WELDMEXARS2	WELD	SOMERSET TELEPHONE CO.
Maine	STNDMEXADS0	DENMARK	STANDISH TELEPHONE CO.
Maine	STNDMEXADS0	SEBAGO	STANDISH TELEPHONE CO.
Maine	STNDMEXADS0	STANDISH	STANDISH TELEPHONE CO.
Maine	BRMNMEXARS1	BREMEN	TIDEWATER TELECOM, INC.
Maine	DMRSMEXADS2	DAMARSCOTT	TIDEWATER TELECOM, INC.
Maine	NWHRMEXARS1	NEW HARBOR	TIDEWATER TELECOM, INC.
Maine	SBRSMEXARS1	SO BRISTOL	TIDEWATER TELECOM, INC.
Maine	SHPSMEXARS1	SHEEPSCOT	TIDEWATER TELECOM, INC.
Maine	UNINMEXADS0	UNION	TIDEWATER TELECOM, INC.
Maine	AURRMEXADS0	AURORA	UNION RIVER TELEPHONE CO.
Maine	BNTPMEXARS1	BEDDINGTON	UNION RIVER TELEPHONE CO.
Maine	OTISMEXARS1	OTIS	UNION RIVER TELEPHONE CO.
Maine	ALBNMEXARS1	ALBION	UNITY TELEPHONE CO., INC.
Maine	NWBGMEXARS1	NEWBURGH	UNITY TELEPHONE CO., INC.
Maine	THRNMEXARS1	THORNDIKE	UNITY TELEPHONE CO., INC.
Maine	UNTYMEXADS0	UNITY	UNITY TELEPHONE CO., INC.
Maine	WRRNMEXADS0	WARREN	WARREN TELEPHONE CO.
Maine	CORNMEXADS0	CORINNA	WEST PENOBSCOT TELEPHONE & TELEGRAPH CO.
Maine	EXTRMEXARS1	EXETER	WEST PENOBSCOT TELEPHONE & TELEGRAPH CO.
Maine	JNBOMEXADS1	JONESBORO	WEST PENOBSCOT TELEPHONE & TELEGRAPH CO.
Maine	STSNMEXARS1	STETSON	WEST PENOBSCOT TELEPHONE & TELEGRAPH CO.

EXHIBIT 6

Compliance with CTIA Code

Service Quality and Consumer Protection

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – The Company does not employ extended service contracts.
4. Allow a trial service – All wireless services, including Lifeline-supported services, are provided on a prepaid basis and therefore there is no extended commitment to the service on the part of the customer. If the service does not suit their needs, they can cancel service at any time without penalty.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – The Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply. Customers can, however, cancel service at any time without penalty.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or an 800 number. These numbers are disclosed on the Company's website and in advertising and customer welcome materials. Customers may also access Customer Service online through the Company's website.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – The Company promptly responds to all complaints. If a customer care representative cannot help a customer, there is an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Due to the Company's service being provided on a prepaid basis, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company

also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, ("mobile wireless devices") that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company's website.
- (5) Response Time. Within two business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.

EXHIBIT 7

Key Management Bios

Sage Telecom Communications, LLC d/b/a TruConnect
Executive Bios

Nathan R. Johnson, Co-Chief Executive Officer

Nathan R. Johnson is Executive Chairman of the Board and an investor in Sage Telecom Communications, LLC d/b/a TruConnect, where he oversees the strategic vision and effective governance of the organization. Mr. Johnson is also a Managing Partner of Gemini Partners, a middle market investment bank, where he has financed, sold, and advised several small and middle market telecommunications companies including Telemac, Distributive Networks, and Pulse Entertainment among others. Prior to Gemini Partners, Mr. Johnson served as Vice President in investment banking at Deutsche Bank, where he advised several Latin American companies including Telefonos de Peru and a Venezuelan phone company in their efforts to take the companies private. Mr. Johnson received his MBA from the Wharton School at the University of Pennsylvania with a concentration in Finance and Multinational Management. He also received his MA from the University of Pennsylvania with concentrations in Latin America and Spanish.

Matthew H. Johnson, Co-Chief Executive Officer

Matthew Johnson is Managing Partner of Gemini Partners and a Board Member and investor of Sage Telecom Communications, LLC d/b/a TruConnect. At Gemini Partners, a middle market investment bank, Mr. Johnson has financed, sold, and advised several small and middle market telecommunications companies including Telemac, Distributive Networks and Pulse Entertainment, among others. Previously, Mr. Johnson was a Vice President in Investment banking at Credit Suisse First Boston where he financed numerous telecommunications companies specifically located in Latin America, including Bestel Communications, a company that operated fiber loops stretching from the US to Mexico, and Globopar a telecommunications and media conglomerate based in Brazil. Mr. Johnson holds an MBA from Northwestern University's Kellogg School of Management.

David Wilder, Chief Financial Officer

David Wilder is a CPA with over 30 years of broad industry experience that has included extensive financial as well as operational responsibilities. David has held positions as President/CFO/Controller with a variety of public and privately held companies in varying industries. They included both US and international assignments.

David's initial professional experience out of college was as a CPA with Deloitte & Touche, 5 years, and Arthur Andersen, 2 years. David left Deloitte & Touche in December of 1988 as a Manager working in the Emerging Business Group. David graduated from the University of Southern California with a degree in Business Administration.

Lucy Sung, General Manager, Global Operations

Ms. Sung is the General Manager of Global Operations for of Sage Telecom Communications, LLC d/b/a TruConnect and leads the Legal, Compliance, Customer Care, Sales Operations, Human Resources, and Billing Operations teams. She has over 30 years of experience in the wireless carrier industry, and has 15 years of experience managing the operations and expansion of wireless ETCs. She has held senior management positions in companies that include AT&T, among others. Ms. Sung holds a Bachelor of Science Degree in Business Administration.

Aleksandr Gudkov, Chief Technology Officer

Mr. Gudkov is the Chief Technology Officer for Sage Telecom Communications, LLC d/b/a TruConnect and leads all Business Intelligence, data warehouse, and technology related initiatives. Mr. Gudkov has over 18 years of experience in information technology supporting private, state and local governments. He has managed several large-scale integration and migration initiatives for the California Lifeline program, CEL child care eligibility system, and Arizona APS energy income eligibility program. Mr. Gudkov holds a Master of Science degree in Nuclear Engineering from National Research Nuclear University, Moscow Russia.

Danielle Perry, Chief Information Officer

Danielle Perry is the Chief Information Officer for Sage Telecom Communications, LLC d/b/a TruConnect and is responsible for leading all technology related aspects of the business; from software development to data analytics. Ms. Perry has over 20 years of experience in the telecommunications field, with 8 of those years being focused on Lifeline. In her previous position she was the Chief Information Officer at Blue Jay Wireless.

EXHIBIT 8

Proposed Lifeline Offering

Sage Telecom Communications, LLC d/b/a TruConnect

Lifeline Offering Effective 12/1/2018

Plan	Minutes	Text	Data	Net Cost to Lifeline Customer
Basic Lifeline Plan	1,000	Unlimited	2.0 GB	\$ 0.00
Bundled Plan 1	Unlimited	Unlimited	2.5 GB	\$15.00
Bundled Plan 2	Unlimited	Unlimited	4.0 GB	\$25.00
Bundled Plan 3	Unlimited	Unlimited	6.0 GB	\$35.00

Plans Include:

- Free device or SIM
- Free calls to Company Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, Call Waiting, Call Forwarding, and 3-Way Calling
- Free Domestic Long Distance
- Data at 3G speeds or higher

Additional airtime available for purchase

Top Up Options*			
Price	Domestic Minutes**	Int'l Minutes**	Data**
\$5.00	500	Unlimited to Mexico, China, Canada & 55 more or \$5 additional international minutes	500MB
\$10.00	1000		1.0 GB
Included in all Plans		Unlimited to Mexico, China, Canada	

* All Top Up options expire after 30 days

** Top Up options are “either/or”, meaning for example, for the top up price of \$5.00, customers can purchase *either* 500 Domestic minutes *or* 500 MB of data or Unlimited to Mexico, China, Canada & 55 more or \$5 additional international minutes

EXHIBIT 9

Estimated Take Rates and Unserved Markets

USAC 2017 Estimates*			
State	Unserved Market	Take Rate	Current Est. Take Rate
AL	666,605	23%	19%
CT	414,154	25%	20%
DC	128,093	26%	16%
DE	100,495	29%	26%
FL	2,392,166	29%	29%
ME	169,058	19%	14%
NC	1,265,629	22%	19%
NH	124,547	11%	9%
NY	2,639,649	29%	29%
TN	867,269	29%	26%
VA	815,331	18%	14%

*Based on USAC data:

<https://www.usac.org/li/about/process-overview/stats/participation.aspx>